

Exhibit 14

From: Julia Tebor <Julia.Tebor@blbglaw.com>
Sent: Wednesday, December 18, 2019 10:34 PM
To: Koch, Bryan
Cc: Michael Blatchley; Michael Mathai; Keil Mueller; Keith Dubanevich; Tim DeJong; gmfishbein@locklaw.com; Gibbs, Patrick; Lightdale, Sarah; Blair, Ryan; Lee, Lauren Gerber; Martin, Christopher L.; z/CTLSecMN
Subject: RE: In re CenturyLink Securities Litigation - Search Criteria Proposal
Attachments: BLBG-#1349004-v1-Plaintiffs__Proposed_Search_Criteria_(2019-12-18).DOCX

[External]

Counsel,

As we explained in our December 16, 2019 letter and during the parties' December 17, 2019 call, our initial Search Criteria counterproposal—which was made in response to Defendants' patently insufficient proposal—was more than reasonable given (among other things) the scale of the fraud alleged at CenturyLink and the scope of discovery that is typical and routine in PSLRA cases, including those that have been litigated in this district and cases currently being litigated by our respective firms in other matters. Nonetheless, as we discussed during the call, in the spirit of compromise and in the interest of moving discovery forward—particularly in light of the fast-approaching substantial completion deadline—we have prepared the attached revised counterproposal, while reserving all rights.

This revision reflects a substantial narrowing of our prior counterproposal, including with respect to the following elements:

- **Search Terms.** During the call, you represented that breaking up searches that went beyond 450 characters would be necessary in order to run those searches on Relativity. We reminded you that we had in fact offered to assist with that process when we sent our initial counterproposal to you, and that we had explained that we had structured the searches in the manner we did to facilitate negotiation of the searches by clarifying their overarching conceptual structure. As discussed on the call, we have broken up longer searches such that all searches in our revised counterproposal can be immediately run in Relativity. Separately, in your letter dated December 13, 2019, you contended that our search terms were "[e]xceedingly overbroad" and "d[id] not relate" to our requests. While we do not agree, as we explained in our December 16 letter and during the call, in another good faith effort to compromise and streamline the parties' negotiations, we have significantly narrowed several search terms in our revision.
- **Custodians.** As we set forth in our December 16 letter and during the parties' call, Plaintiffs' proposal to include approximately 115 custodians for a case alleging nationwide misconduct at a company with tens of thousands of employees over an approximately five-year class period is eminently reasonable and, in fact, typical in cases like this, including those litigated in this District. It is plainly appropriate here, given that CenturyLink itself interviewed 200 employees in connection with its own investigation of the misconduct at issue here, and where Defendants have not offered any explanation whatsoever as to why any of the proposed custodians would not be relevant to this case. Nonetheless, as we discussed during the call, we have narrowed our list of custodians in another good faith effort to compromise, and have now identified a set of approximately 85 priority custodians (including the Executive Defendants)—reducing the number of initial custodians by more than 25%, including by de-prioritizing several in-house counsel.

With respect to time period, we believed (and continue to believe) that our initial proposal was reasonable and made sense. However, in the spirit of compromise, we have reviewed Request 9(c) and have made the changes requested by

Defendants, and re-reviewed each request to make sure the proposed time period was appropriate. As we stated during the call, we are willing to consider any other specific concerns you identify with respect to the time periods proposed, but have not received any further communication from Defendants on this issue.

We have made these modifications in a good faith attempt to bridge the gap between Defendants' initial proposal and our initial counterproposal, and believe our revised counterproposal represents a reasonable compromise. We are of course willing to hear Defendants out regarding any further concerns in connection with our revised counterproposal. However, as we explained during the call, for productive negotiations to continue, Defendants must provide specific substantive reasons, facts and data justifying those concerns—rather than merely invoking unsubstantiated and vague complaints about burden and proportionality, as they have done up to this point.

We are hopeful Plaintiffs' revised proposal is acceptable to Defendants, but if need be, Plaintiffs are available for a call on Friday, December 20, or Monday, December 23.

Thanks,
Julia

From: Koch, Bryan <bkoch@cooley.com>
Sent: Thursday, December 12, 2019 12:39 PM
To: Julia Tebor <Julia.Tebor@blbglaw.com>
Cc: Michael Blatchley <MichaelB@blbglaw.com>; Michael Mathai <Michael.Mathai@blbglaw.com>; Keil Mueller <KM Mueller@stollberne.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; gmfishbein@locklaw.com; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Blair, Ryan <rblair@cooley.com>; Lee, Lauren Gerber <lglee@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; z/CTLSecMN <zCTLSecMN@cooley.com>
Subject: RE: In re CenturyLink Securities Litigation - Search Criteria Proposal

[External]

Thanks, Julia. We will circulate an invitation.

Bryan

Bryan Koch

Cooley LLP
 500 Boylston Street, 14th Floor
 Boston, MA 02116-3736
 +1 617 937 2355 office
 +1 516 637 0462 cell
 +1 617 937 2400 fax
bkoch@cooley.com

From: Julia Tebor <Julia.Tebor@blbglaw.com>
Sent: Wednesday, December 11, 2019 5:09 PM
To: Koch, Bryan <bkoch@cooley.com>
Cc: Michael Blatchley <MichaelB@blbglaw.com>; Michael Mathai <Michael.Mathai@blbglaw.com>; Keil Mueller <KM Mueller@stollberne.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; gmfishbein@locklaw.com; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Blair, Ryan <rblair@cooley.com>; Lee, Lauren Gerber <lglee@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; z/CTLSecMN <zCTLSecMN@cooley.com>
Subject: RE: In re CenturyLink Securities Litigation - Search Criteria Proposal

[External]

Bryan,

11:30 AM ET on Tuesday works for us.

Thanks,
Julia

From: Koch, Bryan <bkoch@cooley.com>
Sent: Wednesday, December 11, 2019 11:50 AM
To: Julia Tebor <Julia.Tebor@blbglaw.com>
Cc: Michael Blatchley <MichaelB@blbglaw.com>; Michael Mathai <Michael.Mathai@blbglaw.com>; Keil Mueller <KM Mueller@stollberne.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; [gmfishbein@locklaw.com](mailto:gfishbein@locklaw.com); Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Blair, Ryan <rblair@cooley.com>; Lee, Lauren Gerber <lglee@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; z/CTLSecMN <zCTLSecMN@cooley.com>
Subject: Re: In re CenturyLink Securities Litigation - Search Criteria Proposal

[External]

Julia,

Unfortunately that time no longer works for us. Could we instead plan for Tuesday at 1130am Eastern?

Thanks,
Bryan

Bryan Koch
Cooley LLP
500 Boylston Street, 14th Floor
+1 617 937 2355 office
+1 516 637 0462 cell
+1 617 937 2400 fax
bkoch@cooley.com

On Dec 9, 2019, at 5:56 PM, Julia Tebor <Julia.Tebor@blbglaw.com> wrote:

[External]

Bryan,

We are available at 4 PM ET on Monday.

Thanks,
Julia

From: Koch, Bryan <bkoch@cooley.com>
Sent: Monday, December 9, 2019 4:36 PM

To: Julia Tebor <Julia.Tebor@blbgllaw.com>; Michael Blatchley <MichaelB@blbgllaw.com>; Michael Mathai <Michael.Mathai@blbgllaw.com>; Keil Mueller <KM Mueller@stollberne.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; gmmfishbein@lockllaw.com
Cc: Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Blair, Ryan <rblair@cooley.com>; Lee, Lauren Gerber <lglee@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; z/CTLSecMN <zCTLSecMN@cooley.com>
Subject: RE: In re CenturyLink Securities Litigation - Search Criteria Proposal

[External]

Julia,

Unfortunately, 3PM Friday (which we discussed subsequent to your email) does not work on our end. Can you do either Monday afternoon or Tuesday midday next week?

Bryan

Bryan Koch

Cooley LLP
500 Boylston Street, 14th Floor
Boston, MA 02116-3736
+1 617 937 2355 office
+1 516 637 0462 cell
+1 617 937 2400 fax
bkoch@cooley.com

From: Julia Tebor <Julia.Tebor@blbgllaw.com>
Sent: Friday, December 6, 2019 9:38 PM
To: Koch, Bryan <bkoch@cooley.com>; Michael Blatchley <MichaelB@blbgllaw.com>; Michael Mathai <Michael.Mathai@blbgllaw.com>; Keil Mueller <KM Mueller@stollberne.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; gmmfishbein@lockllaw.com
Cc: Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Blair, Ryan <rblair@cooley.com>; Lee, Lauren Gerber <lglee@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; z/CTLSecMN <zCTLSecMN@cooley.com>
Subject: RE: In re CenturyLink Securities Litigation - Search Criteria Proposal

[External]

Bryan,

We are unfortunately not available at noon on Friday, but we can be available Friday at 2 PM ET.

Thanks,
Julia

From: Koch, Bryan <bkoch@cooley.com>
Sent: Friday, December 6, 2019 10:15 PM
To: Julia Tebor <Julia.Tebor@blbgllaw.com>; Michael Blatchley <MichaelB@blbgllaw.com>; Michael Mathai <Michael.Mathai@blbgllaw.com>; Keil Mueller <KM Mueller@stollberne.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; gmmfishbein@lockllaw.com
Cc: Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Blair, Ryan <rblair@cooley.com>; Lee, Lauren Gerber <lglee@cooley.com>; Martin, Christopher L.

<cmartin@cooley.com>; z/CTLSecMN <zCTLSecMN@cooley.com>

Subject: RE: In re CenturyLink Securities Litigation - Search Criteria Proposal

[External]

Julia,

Thank you for sending along this counterproposal. As an initial matter, it is not possible to properly assess your counterproposal on the timetable you propose. This is particularly so because our initial review indicates that many of the search strings you propose contain syntactical errors (e.g., misplaced or missing symbols) that will require us to iteratively and repeatedly edit and rerun the searches. Even more problematic, many of the searches also exceed our industry-standard platform's built-in character limit and will require us to redraft single searches as multiple searches, necessitating further syntactical editing. Considering these obstacles, and that Plaintiffs required 22 days to even respond to our initial proposal, we think it is more than reasonable to set a meet and confer for the end of next week. Please let us know if you are available on Friday at noon ET. We reserve the right to reschedule if it is not possible to correct Plaintiffs' searches and complete our review by then.

While we do not think it is productive to issue abstract criticisms of each party's proposal, to briefly respond to the points in your email:

- First, CenturyLink's proposal included numerous custodians beyond the Executive Defendants, including virtually all custodians that Plaintiffs identified in connection with particular requests and, where applicable, custodians in various groups at CenturyLink likely to possess responsive materials. On the other hand, our initial review of Plaintiffs' counterproposal suggests that Plaintiffs intend to conduct a fishing expedition, with custodian counts that are in no way "narrowly tailored" despite the Court's clear instruction to do so. By way of example, Plaintiffs have proposed that CenturyLink search and review *sixty-five* custodial files for a single sub-request (7(b)). Plaintiffs brought their case, and the Court permitted that case to proceed, on a theory that CenturyLink's "senior leadership directly and purposefully" incentivized cramming and that the Executive Defendants "were directly informed of sales misconduct occurring at a massive scale throughout the Company." Compl. ¶¶ 6, 180. While CenturyLink has already volunteered to include various other custodians where appropriate, the Executive Defendants are the focus of this case by Plaintiffs' own design. The many dozens of custodians you have proposed beyond those Executive Defendants are completely inconsistent with your case and any semblance of proportionality.

In addition, we have already provided you with hit counts in the manner you request, and will continue to do so moving forward. To be clear, the search-specific hit counts we provided were deduped within those searches, and the total hit count of 131,794 was deduped across all searches.

- Second, while you claim that our proposals for Request Nos. 6 and 7(b) are too narrow, in fact those two searches alone, as proposed, would yield more than 25,000 documents for review. And considering Request No. 18 is duplicative of many of Plaintiffs' other requests, it is misleading to refer to the hit count for that request in isolation. While CenturyLink is willing to continue developing approaches that would reasonably target the materials Plaintiffs seek, an initial review of your counterproposal suggests that Plaintiffs have little such interest, and have instead proposed substantially overbroad terms, many of which have only loose connection to the actual requests, and almost all of which are likely to generate multitudes of irrelevant documents and impose significant undue burden on CenturyLink.

In addition, CenturyLink proposed search criteria for all of Plaintiffs' requests for which we have agreed to do so. As for the other requests you highlight:

- **Request No. 20:** We have already noted in previous correspondence that our post-meet and confer investigation has led us to conclude that a targeted collection may be more appropriate for Request No. 20 than running ESI. See Nov. 19, 2019 Ltr. from S. Lightdale to M. Blatchley at 4 n.3.
- **Request No. 23:** CenturyLink has not agreed to run ESI searches for this request. See Nov. 4, 2019 Ltr. from P. Gibbs to M. Blatchley at 4. Nor are we aware of any attempt by Plaintiffs to narrow the scope of this overbroad request.
- **Request No. 26(b):** This request seeks disciplinary records, for which a targeted collection is more appropriate.
- **Request No. 31:** We produced certain materials related to CenturyLink's Code of Conduct today and are investigating with our client whether applying Search Criteria to certain custodial files in response to this request would be appropriate, as indicated in our previous correspondence. See Nov. 19, 2019 Ltr. from S. Lightdale to M. Blatchley at 5.
- **Request No. 38:** We have proposed Search Criteria for all sub-parts of this request other than 38(a), which seeks only personnel files. To the extent those personnel files exist, a targeted collection is more appropriate.
- **Request No. 43:** Plaintiffs have narrowed this request as an initial matter, and we have proposed Search Criteria as appropriate for that narrowed request. As for Senator Klobuchar and any related investigations, Plaintiffs narrowed their request to "any correspondence [CenturyLink] may have had with Senator Klobuchar relating to the issues addressed in ¶ 7." We are reviewing whether any such relevant correspondence exists and do not believe it is necessary to apply Search Criteria for this narrowed request.

Finally, we are baffled by your renewed request to seek cloned discovery from the Minnesota AG action. As we have repeatedly explained, the Court has already denied that request. See Nov. 19, 2019 Ltr. from S. Lightdale to M. Blatchley at 2–3; Oct. 1 Hr'g Tr. 75:13-76:4 ("I am not going to require production of the attorney general production. . . . I don't believe that it is the most efficient way to handle discovery in this case."). Despite having no obligation to do so, CenturyLink reproduced a recent production from the Minnesota AG Action to Plaintiffs in the spirit of compromise. See Nov. 22 Ltr. from P. Gibbs to M. Blatchley. In light of the Court's order, there is no simply no basis for any further cloned discovery.

- Third, we completely disagree with your boilerplate assertions that pre- and post-Class Period discovery is "highly relevant." The only example of purported relevancy you cite for either period is "Defendants [sic] statements at the beginning of the Class Period." But generic reference to Defendants' statements does not justify the likely tens or even hundreds of thousands of additional pre-Class Period documents that Plaintiffs' counterproposal would require CenturyLink to review. Where appropriate, CenturyLink has broadened its proposed Search Criteria beyond the Class Period—for example, Request Nos. 14(e), 14(f), 21, 38(d), 40(a), 40(b), and 42. But there is no reason to add additional burden to this review by needlessly broadening the date range without specific reasons related to specific requests that are relevant to the claims and defenses in this case. For now, we suggest focusing on the Class Period discovery on which the parties agree and revisiting other periods as necessary at a later date.

While we appreciate your statement that Plaintiffs intend to continue this negotiation cooperatively and transparently, Plaintiffs must also keep in mind the Court's direction that discovery should be as

"narrowly tailored as possible." We look forward to working with you to develop Search Criteria that heed that instruction. Again, please let us know if you are available on Friday at noon ET.

Bryan

Bryan Koch

Cooley LLP
500 Boylston Street, 14th Floor
Boston, MA 02116-3736
+1 617 937 2355 office
+1 516 637 0462 cell
+1 617 937 2400 fax
bkoch@cooley.com

From: Julia Tebor <Julia.Tebor@blbglaw.com>

Sent: Friday, December 6, 2019 3:07 PM

To: Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Blair, Ryan <rblair@cooley.com>; Lee, Lauren Gerber <lglee@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; z/CTLSecMN <zCTLSecMN@cooley.com>

Cc: Michael Blatchley <MichaelB@blbglaw.com>; Michael Mathai <Michael.Mathai@blbglaw.com>; Keil Mueller <KMuedler@stollberne.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; gmmfishbein@locklaw.com

Subject: RE: In re CenturyLink Securities Litigation - Search Criteria Proposal

[External]

Counsel,

We inadvertently omitted minor edits in redline to Requests 40(b) and 42, which concern investor and/or public relations. Please use the attached version.

Thanks,
Julia

From: Julia Tebor

Sent: Thursday, December 5, 2019 7:57 PM

To: Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Blair, Ryan <rblair@cooley.com>; Lee, Lauren Gerber <lglee@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; z/CTLSecMN <zCTLSecMN@cooley.com>

Cc: Michael Blatchley <MichaelB@blbglaw.com>; Julia Tebor <Julia.Tebor@blbglaw.com>; Michael Mathai <Michael.Mathai@blbglaw.com>; Keil Mueller <KMuedler@stollberne.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; gmmfishbein@locklaw.com

Subject: RE: In re CenturyLink Securities Litigation - Search Criteria Proposal

Counsel,

Attached please find Plaintiffs' counter-proposal to Defendants' proposed Search Criteria.

We appreciate Defendants' initial draft and are hopeful we can continue working cooperatively and transparently to agree on an appropriate Search Criteria and ensure the parties comply with the Court's scheduling order. Below we briefly outline our efforts to address the deficiencies in Defendants' proposal.

First, we are concerned by Defendants' refusal to generally identify any additional custodians beyond the Executive Defendants for the majority of Plaintiffs' requests. To that end, Plaintiffs' have identified additional relevant custodians, including those previously identified in Plaintiffs' initial disclosures. The inclusion of these custodians is necessary and more than reasonable considering the widespread fraud alleged in Complaint, the custodians' unquestionable relevance and possession of highly relevant documents, the scope of classwide damages, and common practice in securities class action litigation.

We understand that several of these search terms, such as those proposed for Request 6, may have to be split up for the purposes of generating hit counts and collecting documents. Please note that we have proposed these searches in this manner for the ease of negotiations, but are happy to discuss the best way to actually perform the searches depending on CenturyLink's IT systems and other considerations, and appreciate the goal of minimizing any potential burden. Additionally, with regard to hit counts, Defendants stated in their email on November 13, 2019 that the proposed searches resulted in 131,794 documents (which includes attachments) after "deduping the results of each request." Please confirm that Defendants deduped any document results across all Requests and not solely within each individual Request, or please provide the deduped results across all Requests. Going forward, please provide hit counts with deduped results by Request and across all Requests.

Further, we note that Defendants have not yet provided information concerning the individuals responsible for the Code of Conduct-issues, which is necessary for the parties to reach agreement on custodians for Request 31. Plaintiffs reiterate that Defendants should provide this information immediately.

Second, Plaintiffs have attempted to address Defendants' improperly narrow search terms. By way of example, in response to Request 6, which asks for "all documents concerning any investigation of CenturyLink's Sales and Billing Practices" and Request 7(g) which asks for "[a]ll Documents concerning any analysis, audit, compilation, investigation, report, or summary concerning Sales and Billing Complaints," Defendants proposed only **cram* OR slam* and (audit* OR investig* OR evaluat*) W/10 (fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR decept* OR deceiv* OR undisclos*)**. This search will almost assuredly not identify the vast majority of relevant documents given it is likely CenturyLink employees only used these specific fraud-based terms when discussing CenturyLink's billing practices. For example, documents produced by Defendants to date demonstrate the opposite, and that CenturyLink employees did not use only these limited terms when discussing the fact that customers were overcharged or were not provided proper disclosures about their bills. See, e.g., CTLMNAG0158425. Indeed, the small number of hits for many of Defendants' proposed terms on their face demonstrate that Defendants' proposed terms do not identify an appropriate universe of relevant documents. See, e.g., Request 18 (returning only 139 documents in response to request for documents concerning changes or modifications to sales and billing practices following entry into the Assurance of Discontinuance with the Arizona AG and the consent order with the Minnesota AG).

We have also made several proposals with regard to various Requests that were omitted by Defendants, including Request 20 (board materials), Request 23 (integration with other acquired companies), Request 26(b) (disciplinary records for sales and billing issues), Request 31 (code of conduct), Request 38 (the hiring, promotion, etc. of Kathy Victory, Kathy Flynn, Linda Olsen, and Eric Adams), Request 43(a) and 43(c) (Senator Klobuchar or the Senate Committee). In addition, with regard to Request 1, concerning documents produced in the Minnesota AG action, we would propose running the search terms for Requests 6 and 7 across the universe of produced documents.

Third, we are concerned that Defendants have proposed improperly limited time periods for the vast majority of Plaintiffs' Requests. As Defendants are aware, Plaintiffs must prove that Defendants statements at the beginning of the Class Period were knowingly or recklessly false at the time they were

made, and necessarily require pre-Class Period discovery to do so. Moreover, and as Defendants are also well aware, numerous post-Class Period events revealed (and continue to reveal) facts that are highly relevant to Plaintiffs' allegations, and many documents created after the Class Period will necessarily refer to and shed light on events occurring during the Class Period. Thus, we have proposed a more reasonable time period for each request.

We look forward to discussing our counter-proposal, and would like to set up a call early next week to discuss initial thoughts and next steps. Please let us know your availability. As discussed previously, Plaintiffs reserve all rights concerning the search criteria.

Thanks,
Julia

From: Koch, Bryan <bkoch@cooley.com>

Sent: Wednesday, November 13, 2019 9:47 PM

To: Michael Blatchley <MichaelB@blbglaw.com>; Julia Tebor <Julia.Tebor@blbglaw.com>; Michael Mathai <Michael.Mathai@blbglaw.com>; Keil Mueller <KM Mueller@stollberne.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; gmmfishbein@locklaw.com

Cc: Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Blair, Ryan <rblair@cooley.com>; Lee, Lauren Gerber <lglee@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; z/CTLSecMN <zCTLSecMN@cooley.com>

Subject: In re CenturyLink Securities Litigation - Search Criteria Proposal

[External]

Counsel,

Attached please find CenturyLink's proposal for Search Criteria, as described in the Court's Order Concerning Protocol Governing Discovery Matters and the Production of Electronically Stored Information. Dkt. No. 478 at 2. Following the parties' several meet and confers—over the course of which CenturyLink explained that certain of Plaintiffs' requests were unreasonably overbroad, and Plaintiffs agreed to narrow several of their requests "in the first instance"—CenturyLink has identified 68 of Plaintiffs' requests and/or sub-requests for which it believes the application of Search Criteria may be appropriate. The attached spreadsheet lists those 68 requests, along with the Search Criteria, including search terms, custodians, and date ranges, that CenturyLink proposes be applied in order to collect, review, and produce non-privileged documents that are responsive to Plaintiffs' requests.

Also included in the attached spreadsheet are "hit counts" for each request. Please note that CenturyLink applied the proposed search terms and date ranges only to the six Executive Defendants—Clay Bailey, David Cole, Dean Douglas, Stewart Ewing, Glen Post, and Karen Puckett—because these are the custodians whose email collections were most readily accessible for our review and testing. Thus, to the extent CenturyLink's proposed Search Criteria include additional custodians for certain requests, the "true" hit counts will almost certainly be greater. For those few requests where CenturyLink has proposed Search Criteria for a smaller set of custodians, the "true" hit counts may also be smaller.

As the hit counts reflect, CenturyLink's proposal would yield a very large collection and review. After deduping the results of each request, the total document count yielded by these Search Criteria, including attachments to document "hits," is 131,794. Moreover, the "true" total hit count, after accounting for the other proposed custodians for whom CenturyLink has not yet applied these Search Criteria, will likely be much greater. A review of this magnitude will entail considerable burden and

expense for CenturyLink, which we trust Plaintiffs will keep in mind as they review and respond to this proposal.

Both CenturyLink's review of these Search Criteria and its testing on custodial collections are ongoing. CenturyLink reserves the right to revise these Search Criteria as it learns more about the associated burden, and the rate at which the Search Criteria appear to yield responsive documents. See Dkt. No. 478 at 2 ("The Parties also agree to employ reasonable sampling/testing procedures to validate any applied search terms"). We note in particular that we have not yet generated "hit counts" for any proposed custodian other than the Executive Defendants, and as those custodial files are tested, we may learn that revisions are necessary in order to successfully develop searches that yield documents responsive to Plaintiffs' requests without causing undue burden to CenturyLink. Thus, to the extent CenturyLink further tests these Search Criteria, and learns that one or more of its proposals would yield a considerable number of non-responsive documents or cause any other form of undue burden to CenturyLink (including, for example, by primarily yielding privileged documents), CenturyLink reserves the right to make any revision to these Search Criteria at any time. Of course, we will always endeavor to explore any such revisions transparently and in good faith, and to maintain productive lines of communication between the parties, just as we trust Plaintiffs will do.

We look forward to a productive discussion as to CenturyLink's proposal.

Best,

Bryan Koch

Cooley LLP
500 Boylston Street, 14th Floor
Boston, MA 02116-3736
+1 617 937 2355 office
+1 516 637 0462 cell
+1 617 937 2400 fax
bkoch@cooley.com

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Request No.	Plaintiffs' Request	Terms	Custodians	Time Period
6	To the extent not called for by the previous Requests, all Documents concerning any investigation of CenturyLink's Sales and Billing Practices, including all Documents constituting, concerning, relating to, or relied on in preparing or conducting any analysis, audit, examination, investigation, report, study, or summary concerning Sales and Billing Practices.	<p>Defendants:</p> <p>cram* OR slam*</p> <p>(audit* OR investig* OR evaluat*) W/10 (fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR deceive* OR undisclos*)</p> <p>Plaintiffs:</p> <p>cram* OR slam*</p> <p>-----</p> <p>("fraud report form" OR analy* OR audit* OR exam* OR CAG OR "customer advocacy group" OR "consumer advocacy group" OR CEG OR "consumer escalation group" OR "customer escalation group" OR evaluat* OR investigat* OR review* OR study OR summar*) AND (accus* OR callback OR "call back" OR complain* OR decei* OR decep* OR defraud* OR disput* OR "fall out" OR fallout OR fraud* OR "gap fill*" OR "rev* gap" OR inaccurate OR integrity OR lie*)</p> <p>-----</p> <p>("fraud report form" OR analy* OR audit* OR exam* OR CAG OR "customer advocacy group" OR "consumer advocacy group" OR CEG OR "consumer escalation group" OR "customer escalation group" OR evaluat* OR investigat* OR review* OR study OR summar*) AND (lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR kowtow* OR kow-tow OR overbill* OR "over bill*" OR "ghost bill*")</p> <p>-----</p> <p>("fraud report form" OR analy* OR audit* OR exam* OR CAG OR "customer advocacy group" OR "consumer advocacy group" OR CEG OR "consumer escalation group" OR "customer escalation group" OR evaluat* OR investigat* OR review* OR study OR summar*) AND (ghostbill* OR overcharg* OR "over charg*" OR "over-charg*" OR overpa* OR "over pay" OR refund* OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR upsell* OR violat* OR RCC)</p> <p>-----</p> <p>("fraud report form" OR analy* OR audit* OR exam* OR CAG OR "customer advocacy group" OR "consumer advocacy group" OR CEG OR "consumer escalation group" OR "customer escalation group" OR evaluat* OR investigat* OR review* OR study OR summar*) AND ("required call" OR TPJ OR Teleperformance OR "revenue protect*" OR "revenue assur*")</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Eric Adams Faith Barela Scott Besselievre Mary Brewer Felisa Bullock Dana Chase Nicholas DeNardo Kathy Flynn Stacey Goff Kevin Grewe Dan Hubert Vernon Irvin Marilyn Judish Kristin Konecny Jay Krachinsky Karen Kroeger Stephanie Lake Vicki Lambert Ellie Long Dennis Long Chris Martin Michelle Martin Rich Martinez Susan McKown John Moore Maxine Moreau Linda Olsen Stephanie Polk</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

			Lev Rejanovinsky Annette Sligar Jim Schmidt Brian Stading James Stevenson II Scott Trezise Kathy Victory Julie Von Ruden Michael Wagner Scott Welch Channing Williams	
7(b)	All Documents concerning Sales and Billing Complaints made, expressed, or reported by any of Your employees, representatives, or agents to any of Your officers, directors, managers, supervisors, hotlines, investigators, message boards, or online townhalls, including any sent to or from Heidi Heiser or any Executive Defendant;	<p>Defendants:</p> <p>EMAIL TO, CC, or FROM is Heidi.Heiser@centurylink.com</p> <p>(complain* OR hotline* OR "hot-line*" OR tipline* OR "tip-line*" OR "message board*" OR "town hall*") W/10 (integrity OR fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR decept* OR deceiv* OR undisclos* or compliance or violat* OR cram* OR slam*)</p> <p>Plaintiffs:</p> <p>(complain* OR escalat* OR concern* OR hotline OR hot-line OR "message board" OR NOHD OR "national order help desk" OR tipline OR tip-line OR "town hall" OR roundtable OR round-table) AND (accus* OR bundl* OR callback OR "call back" OR cancel* OR "combo bill*" OR cram* OR decei* OR decep* OR defraud* OR disput* OR inaccurate OR disclos* OR error* OR inform* OR "door-to-door" OR fraud* OR "gap fill*" OR "rev* gap" OR integrity OR lie* OR lying OR misconduct* OR misled OR mislead*)</p> <p>-----</p> <p>(complain* OR escalat* OR concern* OR hotline OR hot-line OR "message board" OR NOHD OR "national order help desk" OR tipline OR tip-line OR "town hall" OR roundtable OR round-table) AND (misquot* OR mis-quot* OR misrep* OR "order fallout" OR overbill* OR "over bill*" OR "ghost-bill*" OR ghostbill* OR overcharg* OR "over-charg*" OR overpa* OR over-pay OR refund* OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwant* OR upsell* OR violat* OR RCC OR "required call")</p> <p>-----</p> <p>(complain* OR escalat* OR concern* OR hotline OR hot-line OR "message board" OR NOHD OR "national order help desk" OR tipline OR tip-line OR "town hall" OR roundtable OR round-table) w/50 (offer* OR "fine print" OR "T&C*" OR "terms and conditions" OR "activation charge" OR "access recovery charge" OR "all in price" OR "all-in-price" OR "@ease" OR "@ ease" OR "BB cost recovery" OR BBCR OR BBCF OR BCRF OR BRf OR BRR OR "broadband cost recovery" OR "broad band cost recovery")</p> <p>-----</p> <p>(complain* OR escalat* OR concern* OR hotline OR hot-line OR "message board" OR NOHD OR "national order help desk" OR tipline OR tip-line OR "town hall" OR roundtable OR round-table) w/50 ("Caller ID" OR "closer offer fallout" OR "Core Connect" OR DirecTV OR</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Eric Adams Scott Belka Scott Besselièvre Mary Brewer Dana Chase Robert Eatonon Kim Frantz Tracy Fuson Geoff Gairrett Stacey Goff Kevin Grewe Jared Guardipee Rosalind Hartmann Heidi Heiser Leigh Hyslop Vernon Irvin Stacy McDaniel Kristin Konecny Jay Krachinsky</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		<p>“extended area service charge” OR “federal access charge” OR fee* OR “fixed rate” OR ICR OR ICRF OR “Inside Wire Maintenance” OR “install” OR “internet cost recovery)</p> <p>-----</p> <p>(complain* OR escalat* OR concern* OR hotline OR hot-line OR “message board” OR NOHD OR “national order help desk” OR tipline OR tip-line OR “town hall” OR roundtable OR round-table) w/50 (“internet protection” OR lineguard OR “line guard” OR “non-telecom service surcharge” OR “non telecom service surcharge” OR Norton OR “optional service*” OR “price for life”)</p> <p>-----</p> <p>(complain* OR escalat* OR concern* OR hotline OR hot-line OR “message board” OR NOHD OR “national order help desk” OR tipline OR tip-line OR “town hall” OR roundtable OR round-table) w/50 (“price lock” OR “price protec*” OR roadside OR “universal access” OR “universal service” OR upgrad* OR USOC OR “web protection” OR webpack* OR “web pack” OR “wire maintenance”)</p>	<p>Karen Kroeger Stephanie Lake Dennis Long Chris Martin Lee Massey Susan McKown Denise Medina John Moore Maxine Moreau Robert Morton Linda Olsen Cody Peterson Stephanie Polk Lev Rejanovinsky Sayara Rivera Tarry Shuell Jim Schmidt Brian Stading James Stevenson II Cameron Tait Nathan Tyree Kathy Victory Julie Von Ruden Michael Wagner Scott Welch Channing Williams Nekida Williams Ryan Wirth</p>	
7(d)	All Documents concerning Sales and Billing Complaints sent to You by or received by You from any Governmental Entity or the BBB;	<p>Defendants:</p> <p>(“BBB” OR “Better Business Bureau” OR agenc* OR bureau* OR regulator* or “Attorney General*” or “FCC”) W/10 (complaint* OR fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR decept* OR deceiv* OR undisclos*)</p> <p>Plaintiffs:</p> <p>(agenc* OR AG OR AGs OR “Attorney* General*” OR “BBB” OR bureau* OR CID OR “civil investigative demand” OR FCC OR “federal communications commission” OR FTC OR “federal trade commission” OR regulator* OR “request for production” OR SEC OR “Securities Exchange” OR “Securities and exchange” ‘OR subpoena* OR “the state” OR RFP) AND ((agree OR approv* OR ask* OR authoriz* OR confirm* OR consent OR choice OR choos* OR chose OR want*) w/10 (didn* OR fail* OR weren* OR without))</p> <p>-----</p> <p>(agenc* OR AG OR AGs OR “Attorney* General*” OR “BBB” OR bureau* OR CID OR “civil investigative demand” OR FCC OR “federal communications commission” OR FTC OR “federal trade commission” OR regulator* OR “request for production” OR SEC OR “Securities and exchange” ‘OR subpoena* OR “the state” OR RFP) AND (accus* OR complain* OR cram* OR decei* OR decep* OR defraud*)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Scott Besselievre Felisa Bullock</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		<p>-----</p> <p>(agenc* OR AG OR AGs OR "Attorney* General*" OR "BBB" OR bureau* OR CID OR "civil investigative demand" OR FCC OR "federal communications commission" OR FTC OR "federal trade commission" OR regulator* OR "request for production" OR SEC OR "Securities and exchange" 'OR subpoena* OR "the state" OR RFP) AND ((disclos* OR inform* OR represent* OR reveal* OR sale OR sell* OR shar* OR tell*) w/10 (didn* OR fail* OR weren* OR incomplete* OR "not complet*"))</p> <p>-----</p> <p>(agenc* OR AG OR AGs OR "Attorney* General*" OR "BBB" OR bureau* OR CID OR "civil investigative demand" OR FCC OR "federal communications commission" OR FTC OR "federal trade commission" OR regulator* OR "request for production" OR SEC OR "Securities and exchange" 'OR subpoena* OR "the state" OR RFP) AND (discount* w/10 (didn* OR fail* OR missing))</p> <p>-----</p> <p>(agenc* OR AG OR AGs OR "Attorney* General*" OR "BBB" OR bureau* OR CID OR "civil investigative demand" OR FCC OR "federal communications commission" OR FTC OR "federal trade commission" OR regulator* OR "request for production" OR SEC OR "Securities and exchange" 'OR subpoena* OR "the state" OR RFP) AND ("fall out" OR fallout OR fraud* OR "gap fill*" OR "rev* gap")</p> <p>-----</p> <p>(agenc* OR AG OR AGs OR "Attorney* General*" OR "BBB" OR bureau* OR CID OR "civil investigative demand" OR FCC OR "federal communications commission" OR FTC OR "federal trade commission" OR regulator* OR "request for production" OR SEC OR "Securities and exchange" 'OR subpoena* OR "the state" OR RFP) AND (impossible w/5 (quote* OR offer* OR pric*))</p> <p>-----</p> <p>(agenc* OR AG OR AGs OR "Attorney* General*" OR "BBB" OR bureau* OR CID OR "civil investigative demand" OR FCC OR "federal communications commission" OR FTC OR "federal trade commission" OR regulator* OR "request for production" OR SEC OR "Securities and exchange" 'OR subpoena* OR "the state" OR RFP) AND (integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR overbill* OR "over bill*" OR "ghost-bill*"))</p> <p>-----</p> <p>(agenc* OR AG OR AGs OR "Attorney* General*" OR "BBB" OR bureau* OR CID OR "civil investigative demand" OR FCC OR "federal communications commission" OR FTC OR "federal trade commission" OR regulator* OR "request for production" OR SEC OR "Securities and exchange" 'OR subpoena* OR "the state" OR RFP) AND (ghostbill* OR overcharg* OR "over-charge*" OR overpa* OR over-pay OR "call back*" OR callback*</p> <p>-----</p> <p>(agenc* OR AG OR AGs OR "Attorney* General*" OR "BBB" OR bureau* OR CID OR "civil investigative demand" OR FCC OR "federal communications commission" OR FTC OR "federal trade commission" OR regulator* OR "request for production" OR SEC OR "Securities and exchange" 'OR subpoena* OR "the state" OR RFP) AND ((promo* OR quot* OR offer*) w/5 "not available")</p> <p>-----</p>	Mary Brewer Dana Chase Stacey Goff Kevin Grewe John Helbling Dan Hubert Vernon Irvin Kristin Konecny Jay Krachinsky Karen Kroeger Stephanie Lake Ellie Long Dennis Long Chris Martin Susan McKown John Moore Maxine Moreau Linda Olsen Stephanie Polk Lev Rejanovinsky Brian Stading James Stevenson II Chris Sullivan Kathy Victory Julie Von Ruden Scott Welch Channing Williams	
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		<p>(agenc* OR AG OR AGs OR “Attorney* General*” OR “BBB” OR bureau* OR CID OR “civil investigative demand” OR FCC OR “federal communications commission” OR FTC OR “federal trade commission” OR regulator* OR “request for production” OR SEC OR “Securities and exchange” ‘OR subpoena* OR “the state” OR RFP) AND (rate w/3 exist)</p> <p>-----</p> <p>(agenc* OR AG OR AGs OR “Attorney* General*” OR “BBB” OR bureau* OR CID OR “civil investigative demand” OR FCC OR “federal communications commission” OR FTC OR “federal trade commission” OR regulator* OR “request for production” OR SEC OR “Securities and exchange” ‘OR subpoena* OR “the state” OR RFP) AND (refund* OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR upsell* OR violat*)</p>		
7(e)	All Documents concerning Sales and Billing Complaints made to, analyzed by, received by, or prepared by CenturyLink’s Executive & Regulatory Services division, including any reports sent to CenturyLink executives, as described at 103-04;	<p>Defendants:</p> <p>(complain* OR hotline* OR “hot-line*” OR tipline* OR “tip-line*” OR “message board*” OR “town hall*”) W/10 (integrity OR fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR decept* OR deceiv* OR undisclos* or compliance or violat* OR cram* OR slam*)</p> <p>Plaintiffs:</p> <p>((exec* OR regulator*) w/10 (serv* OR div*)) W/25 (offer* or “fine print” OR “T&C*” OR term* OR pric* OR accessor* OR activat* OR “access line” OR “access recovery charge” OR “all in price” OR “all-in-price” OR “@ease” OR “@ ease” OR “BB cost recovery”)</p> <p>-----</p> <p>((exec* OR regulator*) w/10 (serv* OR div*)) W/25 (BBCR OR BBCF OR BCRF OR BRF OR BRR OR “broadband cost recovery” OR “broad band cost recovery” OR “Caller ID” OR “closer offer fallout” OR “Core Connect” OR DirecTV OR equip* OR “extended area service charge”)</p> <p>-----</p> <p>((exec* OR regulator*) w/10 (serv* OR div*)) W/25 (“federal access charge” OR fee* OR “fixed rate” OR hookup* OR HSI OR “high speed internet” OR “high speed internet” OR ICR OR ICRF OR “Inside Wire Maintenance” OR “install” OR “internet cost recovery” OR “internet protection” OR lineguard OR “line guard”)</p> <p>-----</p> <p>((exec* OR regulator*) w/10 (serv* OR div*)) W/25 (“non-telecom service surcharge” OR “non telecom service surcharge” OR Norton OR “optional service*” OR Prism OR “price for life” OR “price lock” OR “price protec*” OR Prysm OR roadside OR service*)</p> <p>-----</p> <p>((exec* OR regulator*) w/10 (serv* OR div*)) W/25 (“self-install” OR subscri* OR tax* OR terminat* OR “universal access” OR “universal service” OR upgrad* OR USOC OR “web protection” OR webpack* OR “web pack” OR “wire maintenance” OR wireline)(group w/5 (integrity OR customer OR customer)) W/25 (offer* or “fine print” OR “T&C*” OR term* OR pric* OR accessor* OR activat* OR “access line” OR “access recovery charge” OR “all in price” OR “all-in-price” OR “@ease” OR “@ ease” OR “BB cost recovery”)</p> <p>-----</p>	<p>Defendants:</p> <p>Scott Belka [For Executive Defs. - 7(b)]</p> <p>Plaintiffs:</p> <p>Scott Belka</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Mary Brewer Felisa Bullock Stacey Goff Kevin Grewe John Helbling Dan Hubert Stephanie Lake Dennis Long Susan McKown Linda Olsen Stephanie Polk Kathy Victory Channing Williams</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		<p>(group w/5 (integrity OR customer OR customer)) W/25 (BBCR OR BBCF OR BCRF OR BRf OR BRR OR “broadband cost recovery” OR “broad band cost recovery” OR “Caller ID” OR “closer offer fallout” OR “Core Connect” OR DirecTV OR equip* OR “extended area service charge”)</p> <p>-----</p> <p>(group w/5 (integrity OR customer OR customer)) W/25 (“federal access charge” OR fee* OR “fixed rate” OR hookup* OR HSI OR “high speed internet” OR “high speed internet” OR ICR OR ICRF OR “Inside Wire Maintenance” OR “install” OR “internet cost recovery” OR “internet protection” OR lineguard OR “line guard”)</p> <p>-----</p> <p>(group w/5 (integrity OR customer OR customer)) W/25 (“non-telecom service surcharge” OR “non telecom service surcharge” OR Norton OR “optional service*” OR Prism OR “price for life” OR “price lock” OR “price protec*” OR Prysm OR roadside OR service*)</p> <p>-----</p> <p>(group w/5 (integrity OR customer OR customer)) W/25 (“self-install” OR subscri* OR tax* OR terminat* OR “universal access” OR “universal service” OR upgrad* OR USOC OR “web protection” OR webpack* OR “web pack” OR “wire maintenance” OR wireline)</p>		
7(f)	All Documents concerning Sales and Billing Complaints or reports or analyses of Sales and Billing Complaints made to, sent to, or received by the individual defendants;	<p>Defendants:</p> <p>See Request 7(b)</p> <p>Plaintiffs:</p> <p>See Request 7(b)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Mary Brewer Felisa Bullock Stacey Goff Kevin Grewe John Helbling Dan Hubert Stephanie Lake Dennis Long Susan McKown Linda Olsen Stephanie Polk</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

			Chris Sullivan Kathy Victory Channing Williams	
7(g)	All Documents concerning any analysis, audit, compilation, investigation, report, or summary concerning Sales and Billing Complaints.	Defendants: See Request 6 Plaintiffs: See Request 6	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: See Request 6	Defendants: 3/1/13 - 7/12/17 Plaintiffs: See Request 6
8	All Documents concerning or relating to the allegations, events and circumstances described in the complaint filed by Heidi Heiser on June 14, 2017, captioned Heiser v. CenturyLink, Inc., CV2017-008928 (Maricopa Co. Ariz.), as well as all Documents exchanged by the parties in that Action.	Defendants: "Heiser" w/10 (complaint* OR fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR deceive* OR deceive* OR undisclos* OR "Wells Fargo") Plaintiffs: (Heiser OR Heidi OR HH) AND (cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR overbill* OR "over bill*" OR overcharg* OR "over charg*") ----- (Heiser OR Heidi OR HH) AND ("over-charg*" OR overpa* OR "over pay" OR over-pay OR slam* OR "town-hall" OR "town hall" OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR upsell* OR violat* OR "didn* disclose" OR "did not disclose" OR "Wells Fargo" OR whistle*)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Michael DelCampo Heidi Heiser Denise Medina Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Heidi Heiser Denise Medina Faith Barela Felisa Bullock Nicholas DeNardo Kathy Flynn Stacey Goff Kevin Grewe John Helbling Dan Hubert	Defendants: 8/1/15 – 10/31/16 Plaintiffs: 8/1/15 - 8/4/17

			Marilyn Judish Michelle Martin Rich Martinez Mark Molzen Annette Sligar Scott Trezise	
9(a)	All Documents concerning CenturyLink’s Quality Assurance team’s role in handling Sales and Billing Complaints or Cramming and Billing Issues, including: (a) Documents concerning the purpose, responsibility, and/or mandate of the Quality Assurance team;	Defendants: (“Quality Assurance” OR “QA”) W/10 (purpos* or responsib* or mandat*) Plaintiffs: (“Quality Assurance” OR “QA”) W/50 (train* OR coach* OR CDB OR churn OR evaluat* OR disciplin* OR perform* OR measure* OR enforce* OR escalat* OR ethic* OR expect* OR rules OR polic* OR fraud OR investigat* OR form* OR purpose OR responsib* OR mandate OR charter OR mission OR assign*)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Linda Olsen Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Linda Olsen Faith Barela Scott Besselievre Mary Brewer Felisa Bullock Nicholas DeNardo Kathy Flynn Stacey Goff Kevin Grewe John Helbling Dan Hubert Jay Kraschinsky Karen Kroeger Stephanie Lake Todd Large Dennis Long Ellie Long Chris Martin Susan McKown John Moore Maxine Moreau Stephanie Polk	Defendants: 3/1/13 - 7/12/17 Plaintiffs: 9/1/12 - 4/1/18

			Lev Rejanovinsky Annette Sligar James Stevenson II Scott Trezise Kathy Victory Julie Von Ruden Michael Wagner Scott Welch Channing Williams Ryan Wirth	
9(b)	All Documents concerning any reviews conducted, reports created or generated, or results of any analysis or study conducted by the Quality Assurance team relating to Sales and Billing Complaints or Cramming and Billing Issues, including regarding employee compensation in or around 2014-2015, including as described at 99-101;	<p>Defendants:</p> <p>(“Quality Assurance” OR “QA”) W/10 ((review* or report* or analy*) W/10 (integrity OR fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR decept* OR deceiv* OR undisclos* or compliance or violat* OR cram* OR slam*))</p> <p>Plaintiffs:</p> <p>(“Quality Assurance” OR QA) AND (cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR overbill* OR “over bill*” OR overcharg* OR “over charg*” OR “over-charg*” OR overpa* OR “over pay”)</p> <p>-----</p> <p>(“Quality Assurance” OR QA) AND (over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR upsell* OR violat* OR QFINIT* OR Q-FINIT* OR bonus* OR incentiv* or comp* OR pay* OR target OR quota OR threshold OR goal)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Linda Olsen</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Linda Olsen</p> <p>Faith Barela Scott Besselievre Mary Brewer Felisa Bullock Nicholas DeNardo Kathy Flynn Stacey Goff Kevin Grewe John Helbling Dan Hubert Jay Kraschinsky Karen Kroeger Stephanie Lake Todd Large Dennis Long Ellie Long Chris Martin</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

			Susan McKown John Moore Maxine Moreau Cody Peterson Stephanie Polk Lev Rejanovinsky Annette Sligar James Stevenson II Scott Trezise Kathy Victory Julie Von Ruden Michael Wagner Scott Welch Channing Williams Ryan Wirth	
9(c)	All Documents concerning the elimination or effective elimination of the Quality Assurance team, including as described at 101.	Defendants: ("Quality Assurance" OR "QA") W/10 (terminat* OR eliminat* OR end* OR clos* OR demis* OR dismantl* OR "shut down") Plaintiffs: ("Quality Assurance" OR "QA") W/50 (terminat* OR eliminat* OR end* OR clos* OR demis* OR dismantl* OR "shut* down" OR chang* OR stop OR "grave concerns" OR "in-house")	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Linda Olsen Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Linda Olsen Faith Barela Scott Besselievre Mary Brewer Felisa Bullock Nicholas DeNardo Kathy Flynn Stacey Goff Kevin Grewe John Helbling Dan Hubert Jay Kraschinsky Karen Kroeger	Defendants: 3/1/13 - 7/12/17 Plaintiffs: 3/1/13 - 7/12/17

			Stephanie Lake Todd Large Dennis Long Ellie Long Chris Martin Susan McKown John Moore Maxine Moreau Stephanie Polk Lev Rejanovinsky Annette Sligar James Stevenson II Scott Trezise Kathy Victory Julie Von Ruden Michael Wagner Scott Welch Channing Williams Ryan Wirth	
10	All Documents concerning any agreement or settlement (including any assurances of discontinuance, settlement agreements, and term sheets) concerning any lawsuit, claim, cause of Action, arbitration, or Governmental Action concerning Sales and Billing Practices.	Defendants: (Bulletin OR “Memo” OR Memorand* OR Noti* OR Announc*) w/25 ((revis* OR updat* OR special OR modif* OR “comply” OR compli*) W/10 (“consent order” OR Attorney General” OR “FCC” OR settlement OR lawsuit)) Plaintiffs:	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Scott Bessalievre Mary Brewer Felisa Bullock Stacey Goff John Helbling Dan Hubert Vernon Irvin Kristin Konecny Karen Kroeger Stephanie Lake	Defendants: 1/1/16 - 7/12/17 Plaintiffs: 1/1/16 - 4/1/18
11	All Documents concerning Your compliance or attempted compliance with any agreement regarding Sales and Billing Practices with any Governmental Entity, including the Assurance of Discontinuance CenturyLink entered into in 2016 with the Arizona Attorney General and the consent order CenturyLink entered into in 2017 with the Minnesota Attorney General.	((Bulletin OR “Memo” OR Memorand* OR Noti* OR Announc* OR huddl* OR message OR policy OR practice OR procedure) AND (revis* OR updat* OR special OR modif* OR compl* OR chang* OR analy* OR review* OR improv* OR audit* OR discontin* OR complain* OR investigat* OR evaluat*)) AND (“consent order” OR “Attorney* General*” OR AG*OR “FCC” OR settlement OR lawsuit OR “term sheet” OR “Assurance of Discontinuance” OR AOD OR RCC OR “required call” OR regulator* OR heiser OR hh)		

			Dennis Long Chris Martin Mark Molzen John Moore Maxine Moreau Linda Olsen James Stevenson II Stephanie Polk Lev Rejanovinsky Scott Welch Kathy Victory Julie Von Ruden Channing Williams	
12	All Documents concerning Your statements in the Assurance of Discontinuance You entered into with the Arizona Attorney General in 2016 that You “fully disclosed” to customers and potential customers all terms, qualifying conditions, termination fees, availability of internet speeds, modem/router purchase requirements, and installation fees.	<p>Defendants:</p> <p>((Arizona OR “AZ”) W/5 (“discontinuance” or “assurance” or “AOD” or settl*)) AND (“ACFA” OR “Arizona Consumer Fraud Act” OR “Order Confirmation” OR (customer* W/5 disclos*) OR revenue* OR cashflow* OR “comply” or compli* or “cost” or investig* or cancel*)</p> <p>Plaintiffs:</p> <p>(Arizona OR “AZ*”) AND (“discontinuance” OR “assurance” OR “AOD” OR settl* OR “ACFA”) AND (fee* OR term* OR condition* OR avail* OR requir* OR disclos* OR “Order Confirmation” OR revenue* OR cashflow* OR “comply” OR compli* OR “cost” OR investig* OR cancel* OR “T&C”)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Scott Bessalievre Mary Brewer Felisa Bullock Stacey Goff John Helbling Dan Hubert Vernon Irvin Kristin Konecny Karen Kroeger Stephanie Lake Dennis Long Chris Martin Mark Molzen John Moore Maxine Moreau Linda Olsen</p>	<p>Defendants:</p> <p>1/1/16 - 7/12/17</p> <p>Plaintiffs:</p> <p>1/1/16 - 4/1/18</p>

			James Stevenson II Chris Sullivan Stephanie Polk Lev Rejanovinsky Scott Welch Kathy Victory Julie Von Ruden Channing Williams	
13(a)	<p>All Documents concerning any change in CenturyLink’s sales training, performance measurement, or Discipline of employees responsible for Consumer Segment or SMB Segment sales (including all customer care representatives, retention specialists, NOHD representatives, and any other employees with sales responsibilities) in 2014-2015, including:</p> <p>(a) All Documents concerning the Discipline of employees responsible for Consumer Segment or SMB Segment sales in 2014-2015, including any changes to Discipline practices and the frequency, type, or analysis of any Discipline Actions;</p>	<p>Defendants:</p> <p>(disciplin* OR train* OR “performance evaluation” OR “performance management” OR “performance improvement” OR “PIP”) W/10 (consumer OR residential OR “small business” OR “small and medium business” OR SMB)</p> <p>Plaintiffs:</p> <p>(train* OR bulletin OR calibrat* OR coach* OR CDB) w/50 (stat* OR chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ* OR new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion OR “go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel* OR analy* OR frequen*)</p> <p>-----</p> <p>(scorecard* OR “service order quality report” OR SOQ OR evaluat* OR perform* OR measur* OR KPI OR PIP OR “promise tracking tool”) w/50 (stat* OR chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ* OR new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion OR “go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel* OR analy* OR frequen*)</p> <p>-----</p> <p>(key w/5 performance) w/50 (stat* OR chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ* OR new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion OR “go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel* OR analy* OR frequen*)</p> <p>-----</p> <p>(punis* OR reprimand OR “corrective action” OR “customer service record” OR disciplin* OR escalat* OR enforc*) w/25 (stat* OR chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ* OR new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion OR “go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel* OR analy* OR frequen*)</p> <p>-----</p> <p>(grievance OR terminat* OR warn*) w/25 (stat* OR chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ* OR new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo*</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn Linda Olsen Scott Trezise</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn Linda Olsen Scott Trezise</p>	<p>Defendants:</p> <p>1/1/14 - 12/31/15</p> <p>Plaintiffs:</p> <p>1/1/14 - 3/31/16</p>

		<p>OR revert* OR reversion OR “go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel* OR analy* OR frequen*)</p> <p>-----</p> <p>(Jefferson city”) w/50 (stat* OR chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ* OR new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion OR “go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel* OR analy* OR frequen*)</p>		
13(b)	All Documents concerning any shift to or rollout of “behavioral coaching” including as described in 111, 113-14;	<p>Defendants:</p> <p>behavior* coaching</p> <p>Plaintiffs:</p> <p>See Request 13(a)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn</p> <p>Linda Olsen Scott Trezise</p>	<p>Defendants:</p> <p>3/1/13 – 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>
13(c)	All Documents concerning changes in Consumer Segment or SMB Segment sales, revenues, and expenses in 2014-2015;	<p>Defendants:</p> <p>((change* or declin* or increas* or improv* or gain* or loss* or fail* or “fall* short” or exceed*) w/5 (sale* OR revenue* OR expense*)) W/5 (consumer OR residential OR “small business” OR “small and medium business” OR SMB)</p> <p>Plaintiffs:</p> <p>((blip OR chang* OR declin* OR increas* OR improv* OR gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash* OR crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*) AND (sale* OR earning* OR revenue* OR expense* OR perform* OR financial)) AND (consumer OR residential OR “small business” OR “small and medium business” OR SMB OR segment)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post</p>	<p>Defendants:</p> <p>1/1/14 - 12/31/15</p> <p>Plaintiffs:</p> <p>1/1/14 - 3/31/16</p>

			Karen Puckett Linda Olsen	
13(d)	All Documents concerning any financial or business impact of any change in CenturyLink’s performance measurement, training, or Discipline of employees in 2014-2015, including as described in 112, 114;	<p>Defendants:</p> <p>((sale* OR revenue* OR expense* OR impact OR consequence) W/10 (employee* or (sales force*))) w/5 (disciplin* OR train* OR “performance evaluation” OR “performance measurement” OR “PIP”)</p> <p>Plaintiffs:</p> <p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((revenue OR sales OR stock OR share*) AND (blip OR chang* OR declin* OR increas* OR improv*))</p> <p>-----</p> <p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((revenue OR sales OR stock OR share*) AND (blip OR chang* OR declin* OR increas* OR improv*))</p> <p>-----</p> <p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (“go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel*)) AND ((revenue OR sales OR stock OR share*) AND (blip OR chang* OR declin* OR increas* OR improv*))</p> <p>-----</p> <p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((revenue OR sales OR stock OR share*) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p> <p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((revenue OR sales OR stock OR share*) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p> <p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (“go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel*)) AND ((revenue OR sales OR stock OR share*) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn Linda Olsen Scott Trezise</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn Linda Olsen Scott Trezise</p>	<p>Defendants:</p> <p>1/1/14 - 12/31/15</p> <p>Plaintiffs:</p> <p>1/1/14 - 3/31/16</p>

		<p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((revenue OR sales OR stock OR share*) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p> <p>-----</p> <p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((revenue OR sales OR stock OR share*) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p> <p>-----</p> <p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (“go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel*)) AND ((revenue OR sales OR stock OR share*) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p> <p>-----</p> <p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((business OR impact OR earnings OR financial OR results) AND (blip OR chang* OR declin* OR increas* OR improv*))</p> <p>-----</p> <p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((business OR impact OR earnings OR financial OR results) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p> <p>((train* OR bulletin OR calibrat* OR coach* OR CDB OR “corrective action” OR “customer service record” OR script*) AND (“go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel*)) AND ((business OR impact OR earnings OR financial OR results) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p> <p>-----</p> <p>((employee OR agent OR rep*) w/3 (measure* OR eval* OR perform*)) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((revenue OR sales OR stock OR share*) AND (blip OR chang* OR declin* OR increas* OR improv*))</p> <p>-----</p> <p>((employee OR agent OR rep*) w/3 (measure* OR eval* OR perform*)) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((revenue OR sales OR stock OR share*) AND (blip OR chang* OR declin* OR increas* OR improv*))</p> <p>-----</p>		
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		<p>((“service order quality report” OR SOQ) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((revenue OR sales OR stock OR share*) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p> <p>((“service order quality report” OR SOQ) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((revenue OR sales OR stock OR share*) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p> <p>((“service order quality report” OR SOQ) AND (“go back” OR return* OR unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel*)) AND ((revenue OR sales OR stock OR share*) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p> <p>((“service order quality report” OR SOQ) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((revenue OR sales OR stock OR share*) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p> <p>-----</p> <p>((“service order quality report” OR SOQ) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((revenue OR sales OR stock OR share*) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p> <p>-----</p> <p>((“service order quality report” OR SOQ) AND (“go back” OR return* OR unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel*)) AND ((revenue OR sales OR stock OR share*) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p> <p>-----</p> <p>((“service order quality report” OR SOQ) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((business OR impact OR earnings OR financial OR results) AND (blip OR chang* OR declin* OR increas* OR improv*))</p> <p>-----</p> <p>((“service order quality report” OR SOQ) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((business OR impact OR earnings OR financial OR results) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p>		
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		<p>((“service order quality report” OR SOQ) AND (“go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel*)) AND ((business OR impact OR earnings OR financial OR results) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p> <p>-----</p> <p>((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((revenue OR sales OR stock OR share*) AND (blip OR chang* OR declin* OR increas* OR improv*))</p> <p>-----</p> <p>((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((revenue OR sales OR stock OR share*) AND (blip OR chang* OR declin* OR increas* OR improv*))</p> <p>-----</p> <p>((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (“go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel*)) AND ((revenue OR sales OR stock OR share*) AND (blip OR chang* OR declin* OR increas* OR improv*))</p> <p>-----</p> <p>((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((revenue OR sales OR stock OR share*) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p> <p>((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((revenue OR sales OR stock OR share*) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p> <p>((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (“go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel*)) AND ((revenue OR sales OR stock OR share*) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p> <p>((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((revenue OR sales OR stock OR share*) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p> <p>-----</p>		
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		<p>((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((revenue OR sales OR stock OR share*) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p> <p>-----</p> <p>((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (“go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel*)) AND ((revenue OR sales OR stock OR share*) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p> <p>-----</p> <p>((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (chang* OR adjust* OR amend* OR modif* OR update* OR revis* OR improv* OR institut* OR alter* OR differ*)) AND ((business OR impact OR earnings OR financial OR results) AND (blip OR chang* OR declin* OR increas* OR improv*))</p> <p>-----</p> <p>((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (new OR novel OR adjust* OR adapt* OR reshap* OR redo* OR rollout OR “roll-out” OR unveil* OR undo* OR revert* OR reversion)) AND ((business OR impact OR earnings OR financial OR results) AND (gain* OR loss* OR fail* OR fall* OR exceed* OR cliff OR crash*))</p> <p>-----</p> <p>((((warn* OR “write up” OR “written up” OR Strike* OR “Jefferson city”) AND (“go back” OR return* unwind* OR abandon* OR “give up” OR dump* OR ditch* OR withdraw* OR jettison* OR cancel*)) AND ((business OR impact OR earnings OR financial OR results) AND (crater* OR decreas* OR down OR drop* OR fell OR inflect* OR reduc* OR worse*))</p>		
13(e)	All Documents concerning any further changes in CenturyLink’s performance measurement, training, or Discipline of employees in 2014-2015, including as described in 117-18.	<p>Defendants:</p> <p>See Request 13(a)</p> <p>Plaintiffs:</p> <p>See Request 13(a)</p>	<p>Defendants:</p> <p>See Request 13(a)</p> <p>Plaintiffs:</p> <p>See Request 13(a)</p>	<p>Defendants:</p> <p>See Request 13(a)</p> <p>Plaintiffs:</p> <p>See Request 13(a)</p>
14(a)	All Documents concerning the following changes to Your financial reporting concerning the Consumer Segment and SMB Segments, including all Documents reflecting, discussing, or referencing the justification for or reasons behind each change (a) through (g) listed below, any analyses concerning each change, and/or any discussion of, analysis of, or reference to the impact of each change on the Company’s reported financial results for the Consumer Segment and SMB Segment:	<p>Defendants:</p> <p>expense* AND segment AND (“first quarter” OR “Q1”) AND (assign* or distribut* or spread* or bucket* or aggregat* or categor* or \$18M or \$20M or “\$18 million” or “\$20 million”)</p> <p>Plaintiffs:</p> <p>((expense* OR cost*) AND segment) AND (*assign* OR distribut* OR spread* OR bucket* OR aggregat* OR categor* OR \$18M* OR \$20M* OR “\$18 million” OR “\$20 million”)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p>	<p>Defendants:</p> <p>1/1/14 - 5/9/14</p> <p>Plaintiffs:</p> <p>12/1/13 - 5/31/14</p>

	(a) The assignment of certain expenses to Your segments in the first quarter of 2014, including as described on pages 13-14 of Your Form 10-Q filed with the SEC on May 9, 2014;		Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Wesley Gibson Bruce Hanks Jantzen Hughes Maxine Moreau Chris Young	
14(b)	The new organizational structure implemented effective November 1, 2014, including as described on pages 4-5 of Your Form 10-K filed with the SEC on February 24, 2015;	Defendants: ((two or four) w/3 segment*) w/25 (report* or organiz* or restructur*) and business and consumer and wholesale and hosting Plaintiffs: ((consumer OR business OR enterprise OR SMB) AND (segment* OR organiz* OR reporting)) AND (align* OR restructur* OR realign* OR renam* OR reassign* OR “re-assign*” OR structur*)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Wesley Gibson Jantzen Hughes Maxine Moreau Chris Young	Defendants: 10/1/14 - 2/24/15 Plaintiffs: 9/1/14 - 3/15/15
14(c)	The new organizational structure implemented during the fourth quarter of 2015, including as described on page 14 of Your Form 10-Q filed with the SEC on November 5, 2015;	Defendants: See 14 (b) Plaintiffs: See Request 14(b)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs:	Defendants: 10/1/14 - 2/24/15 Plaintiffs: 9/1/14 - 3/15/15

			Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Wesley Gibson Jantzen Hughes Maxine Moreau Chris Young	
14(d)	The assignment of certain expenses to Your reportable segments in the first half of 2016, including as described on page 15 of Your Form 10-Q filed with the SEC on November 4, 2016;	Defendants: expense* AND segment AND (“first half” OR “9 months” OR “3 months”) AND (assign* or distribut* or spread* or bucket* or aggregat* or categor* or \$13M OR \$15M OR \$53M OR \$55M OR “\$13 million” OR “\$15 million” OR “\$53 million” OR “\$55 million”) Plaintiffs: ((expense* OR cost*) AND segment*) AND (assign* OR distribut* OR spread* OR bucket* OR aggregat* OR categor* OR \$13M* OR \$15M* OR \$53M* OR \$55M* OR “\$13 million” OR “\$15 million” OR “\$53 million” OR “\$55 million”)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Wesley Gibson Jantzen Hughes Maxine Moreau Chris Young	Defendants: 1/1/16 - 11/4/16 Plaintiffs: 12/1/15 - 11/30/16
14(e)	The new organizational structure implemented in January 2017, including as described on pages 8-9 of Your Form 10-Q filed with the SEC on November 9, 2017;	Defendants: ((segment*) w/25 (renam* or reorganiz* or restructur*)) and enterprise and consumer Plaintiffs: See Request 14(b)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey	Defendants: 12/1/16 - 11/9/17 Plaintiffs: 12/1/16 - 11/30/17

			David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Wesley Gibson Maxine Moreau Chris Young	
14(f)	The new organizational structure implemented effective November 1, 2017, including as described on pages 6-7 of Your Form 10-K filed with the SEC on March 1, 2018;	Defendants: ((segment*) w/25 (renam* or reorganiz* or restructur*)) and enterprise and consumer and “Level 3” Plaintiffs: See Request 14(b)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Wesley Gibson Maxine Moreau Chris Young	Defendants: 10/1/17 - 3/31/18 Plaintiffs: 7/1/17 - 4/1/18
15	All Documents from, to, copying, or referencing Eric Adams (“Adams”), including all Communications with or concerning Bailey, Jim Schmidt, or Brian Stading (including the email described in 110), all Documents concerning any meeting among Adams, Bailey and/or Stading during CenturyLink’s Circle of Excellence event on or around April 23-27, 2014 as described in 109, and all Documents concerning Sales and Billing Practices sent from or to, copying, or referencing Adams.	Defendants: “For Bailey, Schmidt, Stading: (cram* or slam* OR fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR decept* OR deceiv* OR undisclos* OR misquot* OR “customer service” OR “call centers” OR “COE” OR “circle of excellence”) AND (eric w/2 adams) For Adams: (cram* or slam* OR fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR decept* OR deceiv* OR undisclos* OR misquot* OR “customer service” OR “call centers” OR “COE” OR “circle of excellence”) AND (bailey OR schmidt OR stading)” Plaintiffs: For Bailey, Schmidt, Stading, Olsen, Victory, McKown: (cram* OR decei* OR decep* OR defraud* OR fraud* OR ghostbill OR “ghost bill” OR integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR overbill* OR “over bill*” OR overcharg* OR “over charg*” OR “over-charge*” OR	Defendants: Clay Bailey Eric Adams Jim Schmidt Brian Stading Plaintiffs: Clay Bailey Eric Adams Jim Schmidt Brian Stading	Defendants: 4/1/14 - 5/31/14 Plaintiffs: 4/1/14 - 6/10/14

		<p>overpa* OR “over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR upsell* OR violat*) AND (adams OR “EA”)</p> <p>-----</p> <p>((disclos* OR inform* OR represent* OR reveal* OR sale OR sell* OR shar* OR tell*) w/10 (didn* OR fail* OR weren* OR incomplete* OR “not complet*”)) AND (adams OR “EA”)</p> <p>-----</p> <p>((accus* OR agree OR approv* OR ask* OR authoriz* OR confirm* OR consent OR choice OR choos* OR chose OR want*) w/10 (didn* OR fail* OR weren* OR without)) AND (adams OR “EA”)</p> <p>-----</p> <p>For Adams:</p> <p>(cram* OR decei* OR decep* OR defraud* OR fraud* OR ghostbill OR “ghost bill” OR integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR overbill* OR “over bill*” OR overcharg* OR “over charg*” OR “over-charge*” OR overpa* OR “over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR upsell* OR violat*)</p> <p>-----</p> <p>((disclos* OR inform* OR represent* OR reveal* OR sale OR sell* OR shar* OR tell*) w/10 (didn* OR fail* OR weren* OR incomplete* OR “not complet*”))</p> <p>-----</p> <p>((accus* OR agree OR approv* OR ask* OR authoriz* OR confirm* OR consent OR choice OR choos* OR chose OR want*) w/10 (didn* OR fail* OR weren* OR without))</p>		
16	All Documents concerning any change in role or position for Bailey in 2014-2015, including the email sent by Post concerning a change in position as described in 110.	<p>Defendants:</p> <p>Bailey W/10 (hir* OR promot* OR depart* OR demot* OR resign* OR reassign* OR responsibilit* OR role)</p> <p>Plaintiffs:</p> <p>Bailey</p> <p>W/50</p> <p>(hir* OR promot* OR depart* OR demot* OR resign* OR reassign* OR responsibilit* OR role OR position OR job OR function OR duty OR task* OR “Operational Transformation” OR “Transformation Office”)</p>	<p>Defendants:</p> <p>Clay Bailey Glen Post</p> <p>Plaintiffs:</p> <p>Clay Bailey Glen Post</p> <p>Mary Brewer Stephanie Lake Dennis Long Maxine Moreau Stephanie Polk Scott Trezise Channing Williams</p>	<p>Defendants:</p> <p>1/1/14 - 12/31/15</p> <p>Plaintiffs:</p> <p>12/1/13 - 2/1/16</p>

17	All Documents concerning any statements You made concerning CenturyLink’s 2014 or 2015 financial results, including Your statements set forth at 220-36.	<p>Defendants:</p> <p>(“10-Q” OR “10Q” OR “10K” OR “10-K” OR “8K” OR “8-K” OR “annual report” OR “quarterly report” OR (investor* W/2 (conference* or call*))) AND (consumer OR residential OR “small business” OR “small and medium business” OR SMB) AND (“financial result*” OR “financial performance” OR “aggressive corrective action” OR churn*)</p> <p>Plaintiffs:</p> <p>(“10-Q” OR “10Q” OR “10K” OR “10-K” OR “8K” OR “8-K” OR “annual report” OR “quarterly report” OR “talking points” OR “analyst day”) w/50 (“financial result*” OR “financial performance”)</p> <p>-----</p> <p>(“10-Q” OR “10Q” OR “10K” OR “10-K” OR “8K” OR “8-K” OR “annual report” OR “quarterly report” OR “talking points” OR “analyst day”) w/50 (add* w/5 fees)</p> <p>-----</p> <p>(“10-Q” OR “10Q” OR “10K” OR “10-K” OR “8K” OR “8-K” OR “annual report” OR “quarterly report” OR “talking points” OR “analyst day”) AND (“corrective action” OR churn* OR pivot* OR “lifetime value” OR loyal* OR “lifetime revenue” OR “first call resolution”)</p> <p>-----</p> <p>(“10-Q” OR “10Q” OR “10K” OR “10-K” OR “8K” OR “8-K” OR “annual report” OR “quarterly report” OR “talking points” OR “analyst day”) AND ((lower w/5 rate) OR (tighten* w/5 credit))</p> <p>-----</p> <p>(“10-Q” OR “10Q” OR “10K” OR “10-K” OR “8K” OR “8-K” OR “annual report” OR “quarterly report” OR “talking points” OR “analyst day”) AND (“credit standards” OR “better credit quality” OR “better quality customer” OR “credit worth*” OR “higher value bundle” OR “lifetime value” OR ARPU OR “average revenue per” OR “non-paying customer” OR “improved customer experience”)</p> <p>-----</p> <p>(investor* W/2 (conference* OR call*)) w/50 (“financial result*” OR “financial performance”)</p> <p>-----</p> <p>(investor* W/2 (conference* OR call*)) AND (add* w/5 fees)</p> <p>-----</p> <p>(investor* W/2 (conference* OR call*)) AND (“corrective action” OR churn* OR pivot* OR “lifetime value” OR loyal* OR “lifetime revenue” OR “first call resolution”)</p> <p>-----</p> <p>(investor* W/2 (conference* OR call*)) AND ((lower w/5 rate) OR (tighten* w/5 credit))</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Tony Davis Wesley Gibson Stacey Goff Jantzen Hughes Mark Molzen Maxine Moreau Kristina Waugh Chris Young</p>	<p>Defendants:</p> <p>7/1/15 - 3/7/17</p> <p>Plaintiffs:</p> <p>1/1/2014 - 3/7/2017</p>
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18	<p>All Documents concerning any changes or modifications to Sales and Billing Practices made following CenturyLink’s entry into the Assurance of Discontinuance with the Arizona Attorney General in 2016, CenturyLink’s entry into a consent order with the Minnesota Attorney General in 2017, and/or the Special Committee’s investigation in 2017, if any.</p>	<p>Defendants: (“assurance of discontinuance” OR “AOD” OR settlement OR remediat* OR “consent order”) W/10 (Arizona OR “AZ” OR Minnesota OR “MN”)</p> <p>Plaintiffs: (“(“assurance of discontinuance” OR “AOD” OR settle* OR remediat* OR “consent order” OR “Consumer Fraud”)</p> <p>AND (Arizona OR “AZ” OR Minnesota OR “MN” OR AG OR “Attorney* General*”))</p> <p>-----</p> <p>RCC OR (“required call” w/3 (clos* OR component))</p>	<p>Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Scott Bessalievre Mary Brewer Felisa Bullock Stacey Goff John Helbling Dan Hubert Vernon Irvin Kristin Konecny Karen Kroeger Stephanie Lake Dennis Long Chris Martin Maxine Moreau Linda Olsen James Stevenson II Stephanie Polk Lev Rejanovinsky Scott Welch Kathy Victory Julie Von Ruden Chris Sullivan Channing Williams</p>	<p>Defendants: 4/5/16 - 7/12/17</p> <p>Plaintiffs: 3/1/16 - 4/1/2018</p>

19	All Documents concerning Your Communications with the SEC, including all Documents concerning or relating to Your response to the SEC’s August 11, 2015 and September 8, 2015 letters to You and/or Your August 24, 2015 and September 22, 2015 letters to the SEC, including all Documents reviewed, considered or relied upon in formulating and/or preparing Your response to the SEC’s August 11, 2015 and September 8, 2015 letters to You and/or Your August 24, 2015 and September 22, 2015 letters to the SEC.	Defendants: (“Securities and Exchange” OR “Securities & Exchange” OR “SEC”) Plaintiffs: (“Securities and Exchange” OR “Securities & Exchange” OR “Securities Exchange” OR “SEC” OR (Carlos w/3 Pacho) OR (Celeste w/3 Murphy))	Defendants: David Cole Plaintiffs: David Cole Felisa Bullock Wesley Gibson Stacey Goff Kevin Grewe Bruce Hanks John Helbling Dan Hubert Jantzen Hughes Maxine Moreau Chris Sullivan Chris Young	Defendants: 8/11/15 - 9/22/15 Plaintiffs: 9/1/12 - 4/1/18
21	All Documents concerning any analyst report, analyst comment, media article, media broadcast, media inquiry, media publication, or media report concerning Sales and Billing Practices, including all drafts and communications concerning such analyst reports, analyst comments, media articles, media broadcasts, media inquiries, media publications, or media reports.	Defendants: (analyst OR reporter OR article OR media OR press OR publication) AND ((customer* or consumer*) W/10 (fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR deceive* OR undeclar*)) Plaintiffs: (analyst OR report* OR article OR media OR press OR publication OR news OR television OR broadcast OR radio OR UBS OR “JP Morgan” OR JPMorgan OR Barclay* OR Morningstar OR KGW OR K5 OR King5 OR Fox 31 OR KDVR OR “Star Tribune”) AND (cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie* OR lying OR miscond* OR misled OR mislead*) ----- (analyst OR report* OR article OR media OR press OR publication OR news OR television OR broadcast OR radio OR UBS OR “JP Morgan” OR JPMorgan OR Barclay* OR Morningstar OR KGW OR K5 OR King5 OR Fox 31 OR KDVR OR “Star Tribune”) AND (“over-charge*” OR overpay* OR “over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undeclar* OR unwanted* OR upsell* OR violat*) ----- (analyst OR report* OR article OR media OR press OR publication OR news OR television OR broadcast OR radio OR UBS OR “JP Morgan” OR JPMorgan OR Barclay* OR Morningstar OR KGW OR K5 OR King5 OR Fox 31 OR KDVR OR “Star Tribune”) AND (misquot* OR mis-quot* OR misrep* OR overbill* OR “over bill*” OR overcharge* OR “over charge”) -----	Defendants Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Tony Davis Stacey Goff Mark Molzen Kevin Olin Kristina Waugh	Defendants: 6/6/17 - 7/31/17 Plaintiffs: 9/1/12 - 4/1/18

		<p>(analyst OR report* OR article OR media OR press OR publication OR news OR television OR broadcast OR radio OR UBS OR “JP Morgan” OR JPMorgan OR Barclay* OR Morningstar OR KGW OR K5 OR King5 OR Fox 31 OR KDVR OR “Star Tribune”) AND ((disclos* OR inform* OR represent* OR reveal* OR sale OR sell* OR shar* OR sold OR tell*) w/10 (didn* OR fail* OR weren* OR incomplete* OR “not complet*”))</p> <p>-----</p> <p>(analyst OR report* OR article OR media OR press OR publication OR news OR television OR broadcast OR radio OR UBS OR “JP Morgan” OR JPMorgan OR Barclay* OR Morningstar OR KGW OR K5 OR King5 OR Fox 31 OR KDVR OR “Star Tribune”) AND ((accus* OR agree OR approv* OR ask* OR authoriz* OR confirm* OR consent OR choice OR choos* OR chose OR want*) w/10 (didn* OR fail* OR never OR weren* OR without))</p> <p>-----</p> <p>Clemen AND (“best quality experience” OR “better business bureau” OR BBB)</p> <p>-----</p> <p>(KGW OR news OR Montemayor) AND (“back alley tactics” OR “complaints spike as service expands” OR “best possible service” OR “take any complaint seriously” OR “follow routine billing process”)</p> <p>-----</p> <p>“star tribune” AND (lackluster OR “judicial intervention”)</p> <p>-----</p> <p>((KING* OR K5) AND Coppersmith) AND (customer* AND complaint*)</p> <p>-----</p> <p>Morningstar AND “similar overbilling practices”</p>		
22	All Documents concerning CenturyLink’s marketing strategy to compete with cable operators with respect to broadband high speed internet and television services, including all Documents concerning the meetings, discussions, plans and strategies discussed at 70 that were sent from, sent to, reviewed by, discussed by, or reference any Executive Defendant, Joseph Zimmer, Kathy Victory, Kathy Flynn, Linda Olsen, or Brian Stading.	<p>Defendants:</p> <p>(((strategy OR “plan”) W/5 (marketing)) AND (broadband OR “HSI” OR “high speed internet” OR television)) AND (“add fees” or “new fees” or “add charges” or “new charges” or “add-on” or “addon”)</p> <p>Plaintiffs:</p> <p>((strategy OR plan OR policy OR approach OR tactic)</p> <p>W/25</p> <p>(market* OR compet*)</p> <p>AND</p> <p>((broadband OR BB OR HSI OR “high speed internet” OR “high-speed internet” OR “highspeed internet” OR television OR bundl* OR “add-on” or “addon” OR (add w/5 fee))</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn Linda Olsen Brian Stading Kathy Victory</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas</p>	<p>Defendants:</p> <p>1/1/14 - 12/31/14</p> <p>Plaintiffs:</p> <p>3/1/13 - 6/1/15</p>

			Stewart Ewing Glen Post Karen Puckett Kathy Flynn Linda Olsen Brian Stading Kathy Victory	
23	All Documents concerning the integration or combination of applications, policies, processes, or systems concerning CenturyLink’s Sales and Billing Practices with those of any entity CenturyLink acquired, merged with, or combined with, including but not limited to Level 3, Qwest, and Embarq.	Plaintiffs: ((integrat* OR combin* OR implement* OR chang* OR modif*) w/25(“Level 3” OR “L3” OR “Level3” OR “Qwest” OR “Embarq”)) AND (application* OR process* OR system* OR CPlus OR “c+” OR “C Plus” OR CRIS OR database OR EINSTEIN OR IREP OR ORKO OR OQM OR OSCAR OR PAID OR PATS OR PEGA OR QBAT OR QFINIT* OR Q-FINIT* OR ROMS OR RSOE OR Salesforce OR SIMON OR manual OR method* OR policy OR procedur* OR rule* OR train* OR disciplin* OR coach* OR “order accuracy report”)	Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Faith Barela Lorna Christian Nicholas DeNardo Kathy Flynn Melissa Harris Nicole Hendrix Marilyn Judish Ellie Long Jennifer Martin Michelle Martin Rich Martinez Maxine Moreau Linda Olsen Christopher Parker Annette Sligar Scott Trezise Kathy Victory	Plaintiffs: 9/1/12 - 4/1/18
24(a)	All Documents concerning CenturyLink’s evaluation of sales employees, customer care employees, customer service employees, retention specialists, or NOHD employees (or third-parties who provided such services on CenturyLink’s behalf), including: (a) All analyses, discussion, reviews, or references to “Revenue Protection” efforts, as well as any similar initiatives, goals, policies or procedures concerning providing, honoring, or negotiating refunds, discounts, compensation, adjustment of terms, or other offers or	Defendants: “revenue protection” Plaintiffs: (“revenue protection” OR “revenue recovery” OR (sav* w/5 sale)) AND (goal* OR polic* OR procedur* OR process* OR rule* OR target* OR review* OR eval* OR summar* OR anal* OR train* OR coach* OR script* OR eval*) ----- ((offer* OR giv* OR provid* OR honor OR negotiat*) w/5 (discount* OR compen* OR refund* OR credit* OR waiv* OR adjust* OR term* OR offer* OR price*)) AND (goal* OR polic* OR procedur* OR process* OR rule* OR target* OR review* OR eval* OR summar* OR anal* OR	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey	Defendants: 3/1/13 - 7/12/17 Plaintiffs: 9/1/12 - 4/1/18

	proposed resolutions in connection with customer Sales and Billing Complaints or Cramming and Billing Issues;	train* OR coach* OR script* OR eval*) ----- ((resol* w/10 complaint) OR reimburs* OR rebat* OR (pay w/5 back)) AND (goal* OR polic* OR procedur* OR process* OR rule* OR target* OR review* OR eval* OR summar* OR anal* OR train* OR coach* OR script* OR eval*)	David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Faith Barela Scott Belka Scott Besselievre Mary Brewer Dana Chase Nicholas DeNardo Robert Eaton Kathy Flynn Kim Frantz Tracy Fuson Geoff Gairrett Kevin Grewe Jared Guardipee Leigh Hyslop Vernon Irvin Marilyn Judish Karen Kroeger Jay Krachinsky Karen Kroeger Stephanie Lake Vicki Lambert Todd Large Dennis Long Ellie Long Chris Martin Michelle Martin Rich Martinez Lee Massey Susan McKown James Moore John Moore Maxine Moreau Robert Morton Linda Olsen Stephanie Polk Lev Rejanovinsky Sayara Rivera Tarry Shuell Annette Sligar Brian Stading James Stevenson II Scott Trezise	
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			Kathy Victory Michael Wagner Scott Welch Channing Williams Nekida Williams	
24(b)	All Documents concerning any guides, manuals, policies, procedures, records, or reports pertinent to evaluations of such employees;	<p>Defendants:</p> <p>(polic* OR manual* OR guideline* OR procedure*) AND (employee w/20 evaluat* or discipline* or performance) AND (consumer OR residential OR “small business” OR “small and medium business” OR “SMB”)</p> <p>Plaintiffs:</p> <p>(polic* OR manual* OR guide* OR procedure* OR record* OR report* OR process* OR rule*) AND (employee* OR agent* OR rep* OR specialist*) AND (measur* OR evaluat* OR review* OR train* OR perform* OR improv* OR bonus* OR compensat* OR target* OR goal* OR threshold* OR quota* OR coach* OR CDB)</p> <p>-----</p> <p>(polic* OR manual* OR guide* OR procedure* OR record* OR report* OR process* OR rule*) AND (employee* OR agent* OR rep* OR specialist*) AND (punis* OR griev* OR disciplin* OR reprimand* OR strike OR “documented discussion” OR “corrective action” OR “customer service record”)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Faith Barela Scott Besselievre Dana Chase Nicholas DeNardo Kathy Flynn Marilyn Judish Karen Kroeger Jay Krachinsky Karen Kroeger Ellie Long Chris Martin Michelle Martin Rich Martinez Maxine Moreau Cody Peterson Linda Olsen Lev Rejanovinsky Tarry Shuell Annette Sligar Brian Stading Scott Trezise Kathy Victory Julie Von Ruden</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

24(c)	All Documents concerning any Sales Targets pertaining to such employees, including all Documents concerning employees' success or failure in meeting such Sales Targets and all Documents concerning any adjustments or changes to Sales Targets that were analyzed, considered, or proposed, regardless of whether or not they were implemented;	<p>Defendants:</p> <p>((“sales goal*” OR “sales target*”) w/10 (success* or fail* or meet* or met or succeed or “fall* short” or change* or adjust* or raise* or cut* or increas* or decreas*)) AND (employee* OR agent* or rep*) AND (consumer OR residential OR “small business” OR “small and medium business” OR “SMB”)</p> <p>Plaintiffs:</p> <p>(employee OR agent* OR rep* OR perform*)</p> <p>AND</p> <p>(goal OR target OR quota OR “at least” OR threshold OR ((minimum OR maximum) w/5 (sales OR revenue)))</p> <p>AND</p> <p>(success* or fail* or meet* or met or succeed or “fall* short” or change* or adjust* or raise* or cut* or increas* or decreas* OR improv* OR amend* OR modif* OR update* OR revis* OR institute* OR alter* OR reshap* OR adapt* OR rollout OR “roll out” OR “roll-out”)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Faith Barela Scott Besselievre Dana Chase Nicholas DeNardo Kathy Flynn Marilyn Judish Karen Kroeger Jay Krachinsky Karen Kroeger Ellie Long Chris Martin Michelle Martin Rich Martinez James Moore Maxine Moreau Linda Olsen Cody Peterson Lev Rejanovinsky Sayara Rivera Tarry Shuell Annette Sligar Brian Stading Scott Trezise Kathy Victory Julie Von Ruden</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>
24(d)	All Documents sent to, sent by, or copied to any Executive Defendant concerning Sales Targets;	<p>Defendants:</p> <p>See request 24(c)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p>

		Plaintiffs: See Request 24(c)	Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett	Plaintiffs: 9/1/12 - 4/1/18
24(e)	All data or reports concerning Sales Targets that were accessible by or made available to any Executive Defendant;	Defendants: See request 24(c) Plaintiffs: See Request 24(c)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Faith Barela Scott Besselievre Dana Chase Nicholas DeNardo Kathy Flynn Marilyn Judish Karen Kroeger Jay Krachinsky Karen Kroeger Ellie Long Chris Martin Michelle Martin Rich Martinez Maxine Moreau Linda Olsen Lev Rejanovinsky	Defendants: 3/1/13 - 7/12/17 Plaintiffs: 9/1/12 - 4/1/18

			Annette Sligar Brian Stading Scott Trezise Kathy Victory Julie Von Ruden	
24(f)	All Documents concerning any limitations on price adjustments or credits issued in connection with Sales and Billing Practices, including documents concerning employees' success or failure in meeting such limitations.	Defendants: (adjust* OR credit*) w/5 (limit* OR quota* OR max* OR lower* OR restrict*) AND (consumer OR residential OR "small business" OR "small and medium business" OR "SMB") Plaintiffs: (adjust* OR credit* OR waiv* OR rebat* OR compensat* OR refund* OR "pay* back") W/25 (limit* OR quota* OR max* OR lower* OR restrict*)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Faith Barela Scott Besselievre Mary Brewer Dana Chase Nicholas DeNardo Robert Eaton Kathy Flynn Kim Frantz Tracy Fuson Geoff Gairrett Kevin Grewe Jared Guardipee Leigh Hyslop Marilyn Judish Karen Kroeger Jay Krachinsky Karen Kroeger Stephanie Lake Vicki Lambert Todd Large Dennis Long Ellie Long Chris Martin Michelle Martin	Defendants: 3/1/13 - 7/12/17 Plaintiffs: 9/1/12 - 4/1/18

			Rich Martinez Lee Massey Susan McKown John Moore Maxine Moreau Robert Morton Linda Olsen Stephanie Polk Lev Rejanovinsky Tarry Shuell Annette Sligar Brian Stading James Stevenson II Scott Trezise Kathy Victory Julie Von Ruden Scott Welch Channing Williams Nekida Williams	
25(a)	All Documents concerning training of sales employees, customer care employees, customer service employees, retention specialists, or NOHD employees (or third-parties who provided such services on CenturyLink’s behalf), including: (a) All Documents concerning any guides, manuals, policies, procedures, records, scripts or reports concerning customer interactions, quotation of prices, or billing for such employees, including as described at 81-82;	<p>Defendants:</p> <p>((guide* or manual* or policy* or procedure* or script* or bulletin w/3 (employee* or sales*)) OR “consumer huddle”) AND ((quot* or bill*) w/5 (customer* or issue*)) AND (consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”)</p> <p>Plaintiffs:</p> <p>((guide* OR manual* OR policy* OR procedure* OR script* OR bulletin OR train* OR huddle OR coach* OR teach* OR report* OR record*) w/50 (employee* OR agent* OR “national order help desk” OR NOHD OR “retention specialist” OR vendor)) AND (offer* or “fine print” OR “T&C*” OR term* OR activat* OR “access line” OR “access recovery charge” OR “all in price” OR “all-in-price” OR “@ease” OR “@ ease” OR “BB cost recovery”)</p> <p>-----</p> <p>((guide* OR manual* OR policy* OR procedure* OR script* OR bulletin OR train* OR huddle OR coach* OR teach* OR report* OR record*) w/50 (employee* OR agent* OR “national order help desk” OR NOHD OR “retention specialist” OR vendor)) AND (BBCR OR BBCF OR BCRF OR BRF OR BRR OR “broadband cost recovery” OR “broad band cost recovery” OR “Caller ID” OR charge*)</p> <p>-----</p> <p>((guide* OR manual* OR policy* OR procedure* OR script* OR bulletin OR train* OR huddle OR coach* OR teach* OR report* OR record*) w/50 (employee* OR agent* OR “national order help desk” OR NOHD OR “retention specialist” OR vendor)) AND (closer* OR “Core Connect” OR DirecTV OR equip* OR “extended area service charge” OR discount* OR “federal access charge” OR fee* OR “fixed rate” OR hookup* OR HSI OR “high speed internet” OR ICR OR ICRF OR “Inside Wire Maintenance”)</p> <p>-----</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Linda Olsen</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Linda Olsen</p> <p>Faith Barela Scott Besselievre Dana Chase Nicholas DeNardo Kathy Flynn Marilyn Judish Karen Kroeger Jay Krachinsky</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		<p>((guide* OR manual* OR policy* OR procedure* OR script* OR bulletin OR train* OR huddle OR coach* OR teach* OR report* OR record*) w/50 (employee* OR agent* OR “national order help desk” OR NOHD OR “retention specialist” OR vendor)) AND (“install” OR “internet cost recovery” OR “internet protection” OR lineguard OR “line guard” OR “non-telecom service surcharge” OR “non telecom service surcharge” OR Norton OR “optional service*” OR “price for life”)</p> <p>-----</p> <p>((guide* OR manual* OR policy* OR procedure* OR script* OR bulletin OR train* OR huddle OR coach* OR teach* OR report* OR record*) w/50 (employee* OR agent* OR “national order help desk” OR NOHD OR “retention specialist” OR vendor)) AND (“price lock” OR “price protection” OR roadside OR “universal access” OR “universal service” OR USOC OR “web protection” OR webpack* OR “web pack” OR “wire maintenance” OR wireline OR quote OR disclose OR disclosure)</p>	<p>Karen Kroeger Ellie Long Chris Martin Michelle Martin Rich Martinez Maxine Moreau Linda Olsen Lev Rejanovinsky Tarry Shuell Annette Sligar Brian Stading Scott Trezise Kathy Victory Julie Von Ruden</p>	
25(b)	<p>All Documents concerning Sales and Billing Practices relating to the Company’s Order Quality Management (“OQM”) system, the Q-FINITY system, or any similar program or system used to track, train, coach, evaluate, review, or analyze Consumer Segment and SMB Segment customer interactions;</p>	<p>Defendants:</p> <p>(“OQM” or “Q-FINITY”) AND (consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”) AND (customer* w/10 (review* or evaluat* or coach* or analy*))</p> <p>Plaintiffs:</p> <p>((CPlus OR “c+” OR CRIS OR database OR EINSTEIN OR IREP OR KPI OR “key performance indicator” OR ORKO OR “order quality management” OR “order accuracy report” OR OQM OR OSCAR OR PAID OR PATS OR PEGA OR QBAT OR QFINIT* OR Q-FINIT* OR ROMS OR RSOE OR Salesforce OR SIMON) AND (customer* OR consumer OR client)) W/25 ((review* OR evaluat* OR coach* OR analy* OR complain* OR inquir*))</p> <p>-----</p> <p>((CPlus OR “c+” OR CRIS OR database OR EINSTEIN OR IREP OR KPI OR “key performance indicator” OR ORKO OR “order quality management” OR “order accuracy report” OR OQM OR OSCAR OR PAID OR PATS OR PEGA OR QBAT OR QFINIT* OR Q-FINIT* OR ROMS OR RSOE OR Salesforce OR SIMON) AND (customer* OR consumer OR client)) W/25 (train OR enforce* OR teach* OR escalat* OR summar*)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Faith Barela Scott Besselievre Dana Chase Lorna Christian Nicholas DeNardo Kathy Flynn Melissa Harris Nicole Hendrix Marilyn Judish Karen Kroeger Jay Krachinsky Karen Kroeger Ellie Long Chris Martin Jennifer Martin</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

			Michelle Martin Rich Martinez Maxine Moreau Linda Olsen Christopher Parker Lev Rejanovinsky Tarry Shuell Annette Sligar Brian Stading Scott Trezise Kathy Victory Julie Von Ruden	
25(c)	All Documents concerning the recording of sales and other customer calls, the use of such recordings to coach or train sales employees, as well as all Documents concerning the destruction and/or preservation of such recordings; and	<p>Defendants:</p> <p>(call w/5 record*) W/25 (train* or coach* or destroy* or destruct* or delet* preserv*)</p> <p>Plaintiffs:</p> <p>(call w/5 (record*OR monitor*))</p> <p>AND</p> <p>(train* OR coach* OR facilitator OR teach* OR lesson* OR destroy* OR instruct* OR educat* OR destruct* OR delet* OR preserv* OR eras* OR “throw out” OR retain OR keep)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Faith Barela Scott Besselievre Dana Chase Lorna Christian Nicholas DeNardo Kathy Flynn Melissa Harris Nicole Hendrix Marilyn Judish Karen Kroeger Jay Krachinsky Karen Kroeger Ellie Long Chris Martin Jennifer Martin Michelle Martin Rich Martinez</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

			Maxine Moreau Linda Olsen Christopher Parker Cody Peterson Lev Rejanovinsky Tarry Shuell Annette Sligar Brian Stading Scott Trezise Kathy Victory Julie Von Ruden	
25(d)	All call recordings addressing Cramming and Billing Issues that were reviewed, flagged or documented in the Company’s Q-FINITY or Order Quality Management (“OQM”) systems, including as described at 87 and 99, and all Documents concerning any coaching, training, or Discipline related to such instances of Cramming and Billing Issues.	<p>Defendants:</p> <p>(integrity OR fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR deceive* OR undeclar* or compliance or violat* OR cram*) AND (“Q-FINITY” or “OQM”)</p> <p>Plaintiffs:</p> <p>(“call record*” OR “call monitor*” OR Q-FINITY OR QFINIT* OR OQM OR “order quality management”) AND (accus* OR ((agree OR approv* OR ask* OR authoriz* OR confirm* OR consent OR choice OR choos* OR chose OR want*) w/10 (didn* OR fail* OR weren* OR without)) OR compliance OR comply Or complies OR cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep*)</p> <p>-----</p> <p>(“call record*” OR “call monitor*” OR Q-FINITY OR QFINIT* OR OQM OR “order quality management”) AND (overbill* OR “over bill*” OR overcharg* OR “over charg*” OR “over-charge*” OR overpa* OR “over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undeclar* OR unwanted* OR upsell* OR violat* OR ((disclos* OR inform* OR represent* OR reveal* OR sale OR sell* OR shar* OR tell*) w/10 (didn* OR fail* OR weren* OR incomplete* OR “not complet*”))</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Faith Barela Scott Besselievre Dana Chase Lorna Christian Nicholas DeNardo Kathy Flynn Melissa Harris Nicole Hendrix Marilyn Judish Karen Kroeger Jay Krachinsky Karen Kroeger Ellie Long Chris Martin Jennifer Martin Michelle Martin Rich Martinez Maxine Moreau</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

			Linda Olsen Christopher Parker Lev Rejanovinsky Tarry Shuell Annette Sligar Brian Stading Scott Trezise Kathy Victory Julie Von Ruden	
26(c)	All Documents sent to, sent by, copied to, or forwarded to any Executive Defendant concerning Discipline of employees;	<p>Defendants:</p> <p>(discipl* OR demot* OR terminat* OR fire* OR reprimand*) AND (consumer OR residential OR “small business” OR “small and medium business” OR “SMB”) AND (cram* or slam* or fraud* or mislead* or misled or deceiv* or deceive* or misrepresent* or unauthoriz* or misquot*)</p> <p>Plaintiffs:</p> <p>(“corrective action” OR “customer service record” OR disciplin* OR demot* OR fire OR fired OR firing * OR reprimand* OR terminat*) AND (cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR overbill* OR “over bill”)</p> <p>-----</p> <p>(“corrective action” OR “customer service record” OR disciplin* OR demot* OR fire OR fired OR firing * OR reprimand* OR terminat*) AND (overcharg* OR “over charg*” OR “over-charge*” OR overpa* OR “over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR upsell* OR violat*)</p> <p>-----</p> <p>(“corrective action” OR “customer service record” OR disciplin* OR demot* OR fire OR fired OR firing * OR reprimand* OR terminat*) AND ((disclos* OR inform* OR represent* OR reveal* OR sale OR sell* OR shar* OR tell*) w/10 (didn* OR fail* OR weren* OR incomplete* OR “not complet*”))</p> <p>-----</p> <p>(“corrective action” OR “customer service record” OR disciplin* OR demot* OR fire OR fired OR firing * OR reprimand* OR terminat*) AND (accus* OR ((agree OR approv* OR ask* OR authoriz* OR confirm* OR consent OR choice OR choos* OR chose OR want*) w/10 (didn* OR fail* OR weren* OR without)))</p> <p>-----</p> <p>(strike OR “write up” OR “written up” OR punis* OR warn* OR “document* discussion” OR escalat* OR “integrity group” OR suspend* OR suspension OR “exit interview” OR turnover OR churn*) AND (cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR overbill* OR “over bill”)</p> <p>-----</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		<p>(strike OR “write up” OR “written up” OR punis* OR warn* OR “document* discussion” OR escalat* OR “integrity group” OR suspend* OR suspension OR “exit interview” OR turnover OR churn*) AND (overcharg* OR “over charg*” OR “over-charge*” OR overpa* OR “over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR upsell* OR violat*)</p> <p>-----</p> <p>(strike OR “write up” OR “written up” OR punis* OR warn* OR “document* discussion” OR escalat* OR “integrity group” OR suspend* OR suspension OR “exit interview” OR turnover OR churn*) AND ((disclos* OR inform* OR represent* OR reveal* OR sale OR sell* OR shar* OR tell*) w/10 (didn* OR fail* OR weren* OR incomplete* OR “not complet*”))</p> <p>-----</p> <p>(strike OR “write up” OR “written up” OR punis* OR warn* OR “document* discussion” OR escalat* OR “integrity group” OR suspend* OR suspension OR “exit interview” OR turnover OR churn*) AND (accus* OR ((agree OR approv* OR ask* OR authoriz* OR confirm* OR consent OR choice OR choos* OR chose OR want*) w/10 (didn* OR fail* OR weren* OR without)))</p>		
26(d)	All data or reports concerning Discipline of employees that were accessible by or made available to any Executive Defendant;	<p>Defendants:</p> <p>See Request 26(c)</p> <p>Plaintiffs:</p> <p>See Request 26(c)</p>	<p>Defendants:</p> <p>See Request 26(c)</p> <p>Plaintiffs:</p> <p>See Request 26(c)</p>	<p>Defendants:</p> <p>See Request 26(c)</p> <p>Plaintiffs:</p> <p>See Request 26(c)</p>
28(a)	All Documents concerning Your Communications with customers or potential customers concerning Consumer Segment or SMB Segment product or service offerings, including: (a) All Documents concerning any guidelines, policies, practices, procedures, or training concerning the prices offered for services and products to customers or potential customers;	<p>Defendants:</p> <p>((polic* OR manual* OR guide* OR procedure* OR bulletin) w/5 (offer* OR disclos* or “fine print” OR “T&CSs”)) OR ((fee* or charg*) w/5 (justif* or reason* or rationale*)) OR ((train* or discipl* or punis* or reassign*) w/5 (disclos* or inaccur*)) OR ((“closer” or “fixed rate” or “price for life”) w/5 (accura* or error*)) AND (consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”)</p> <p>Plaintiffs:</p> <p>(polic* OR manual* OR guide* OR procedure* OR bulletin OR train* OR coach* OR teach* OR script* OR facilitator) w/25 (accessor* OR activat* OR “access line” OR “access recovery charge” OR “all in price” OR “all-in-price” OR “@ease” OR “@ ease” OR “BB cost recovery” OR BBCR OR BBCF OR BCRF OR BRF OR BRR OR “broadband cost recovery”)</p> <p>-----</p> <p>(polic* OR manual* OR guide* OR procedure* OR bulletin OR train* OR coach* OR teach* OR script* OR facilitator) w/25 (“broad band cost recovery” OR “Caller ID” OR “closer offer fallout” OR “Core Connect” OR DirecTV OR equip* OR “extended area service charge”)</p> <p>-----</p> <p>(polic* OR manual* OR guide* OR procedure* OR bulletin OR train* OR coach* OR teach* OR script* OR facilitator) w/25 (“federal access charge” OR fee* OR “fixed rate” OR hookup* OR HSI OR “high speed internet” OR ICR OR ICRF OR “Inside Wire Maintenance” OR “install” OR “internet cost recovery” OR “internet protection” OR lineguard OR “line guard”)</p> <p>-----</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Faith Barela Scott Besselievre Mary Brewer Gena Carson Dana Chase Lorna Christian Nicholas DeNardo</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		<p>(polic* OR manual* OR guide* OR procedure* OR bulletin OR train* OR coach* OR teach* OR script* OR facilitator) w/25 (“non-telecom service surcharge” OR “non telecom service surcharge” OR Norton OR “optional service*” OR Prism OR “price for life” OR “price lock” OR “price protection” OR Prysm OR roadside OR service* OR “self-install”)</p> <p>-----</p> <p>(polic* OR manual* OR guide* OR procedure* OR bulletin OR train* OR coach* OR teach* OR script* OR facilitator) w/25 (subscri* OR tax* OR terminat* OR “universal access” OR “universal service” OR upgrad* OR USOC OR “web protection” OR webpack* OR “web pack” OR “wire maintenance” OR wireline)</p>	<p>Kathy Flynn Tracy Fuson Kathleen Hardy Marilyn Judish Karen Kroeger Jay Krachinsky Karen Kroeger Stephanie Lake Vicky Lambert Dennis Long Ellie Long Chris Martin Michelle Martin Rich Martinez Maxine Moreau Linda Olsen Stephanie Polk Lev Rejanovinsky Tarry Shuell Annette Sligar Brian Stading James Stevenson II Scott Trezise Kathy Victory Julie Von Ruden Janet Washam Channing Williams</p>	
28(b)	<p>All Documents concerning the disclosure of the terms of Consumer Segment or SMB Segment customer offerings, including the existence of or details concerning optional services, promotional terms (including any expiration dates), the purpose or justification for any fee or charge (including any fee or charge represented or described to be a fee or charge required by a Governmental Entity), and any training and Discipline Actions taken in connection with disclosure of Consumer Segment or SMB Segment product and service offerings;</p>	<p>Defendants:</p> <p>((polic* OR manual* OR guide* OR procedure* OR bulletin) w/5 (offer* OR disclos* or “fine print” OR “T&CSs”)) OR ((fee* or charg*) w/5 (justif* or reason* or rationale*)) OR ((train* or discipl* or punis* or reassign*) w/5 (disclos* or inaccur*)) OR ((“closer” or “fixed rate” or “price for life”) w/5 (accura* or error*)) AND (consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”)</p> <p>Plaintiffs:</p> <p>(justif* or reason* or rationale OR purpose) w/50 (offer* or “fine print” OR “T&C*” OR term* OR pric* OR accessor* OR activat* OR “access line” OR “access recovery charge” OR “all in price” OR “all-in-price” OR “@ease” OR “@ ease” OR “BB cost recovery” OR BBCR OR BBCF OR BCRF OR BRF)</p> <p>-----</p> <p>(justif* or reason* or rationale OR purpose) w/50 (BRR OR “broadband cost recovery” OR “broad band cost recovery” OR “Caller ID” OR “closer offer fallout” OR “Core Connect” OR DirectTV OR equip* OR “extended area service charge” OR “federal access charge” OR fee* OR “fixed rate”)</p> <p>-----</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Faith Barela Scott Besselievre</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

	<p>(justif* or reason* or rationale OR purpose) w/50 (hookup* OR HSI OR “high speed internet” OR ICR OR ICRF OR “Inside Wire Maintenance” OR “install” OR “internet cost recovery” OR “internet protection” OR lineguard OR “line guard” OR “non-telecom service surcharge” OR “non telecom)</p> <p>-----</p> <p>(justif* or reason* or rationale OR purpose) w/50 (service surcharge” OR Norton OR “optional service*” OR Prism OR “price for life” OR “price lock” OR “price protect*” OR Prysm OR roadside OR service* OR “self-install” OR subscri* OR tax* OR “universal access” OR “universal service”)</p> <p>-----</p> <p>(justif* or reason* or rationale OR purpose) w/50 (upgrad* OR USOC OR “web protection” OR webpack* OR “web pack” OR “wire maintenance” OR wireline)</p> <p>-----</p> <p>(disciplin* OR punis* OR terminat* OR fire OR firing OR fired) w/50 (offer* or “fine print” OR “T&C*” OR term* OR pric* OR accessor* OR activat* OR “access line” OR “access recovery charge” OR “all in price” OR “all-in-price” OR “@ease” OR “@ ease” OR “BB cost recovery” OR BBCR OR BBCF OR BCRF OR BRF)</p> <p>-----</p> <p>(disciplin* OR punis* OR terminat* OR fire OR firing OR fired) w/50 (BRR OR “broadband cost recovery” OR “broad band cost recovery” OR “Caller ID” OR “closer offer fallout” OR “Core Connect” OR DirecTV OR equip* OR “extended area service charge” OR “federal access charge” OR fee* OR “fixed rate”)</p> <p>-----</p> <p>(disciplin* OR punis* OR terminat* OR fire OR firing OR fired) w/50 (hookup* OR HSI OR “high speed internet” OR ICR OR ICRF OR “Inside Wire Maintenance” OR “install” OR “internet cost recovery” OR “internet protection” OR lineguard OR “line guard” OR “non-telecom service surcharge” OR “non telecom)</p> <p>-----</p> <p>(disciplin* OR punis* OR terminat* OR fire OR firing OR fired) w/50 (service surcharge” OR Norton OR “optional service*” OR Prism OR “price for life” OR “price lock” OR “price protect*” OR Prysm OR roadside OR service* OR “self-install” OR subscri* OR tax* OR “universal access” OR “universal service”)</p> <p>-----</p> <p>(disciplin* OR punis* OR terminat* OR fire OR firing OR fired) w/50 (upgrad* OR USOC OR “web protection” OR webpack* OR “web pack” OR “wire maintenance” OR wireline)</p> <p>-----</p> <p>(“corrective action” OR “written up” OR “write up” OR strik* OR warn* OR reprimand* OR train* OR coach* OR script*) w/50 (offer* or “fine print” OR “T&C*” OR term* OR pric* OR accessor* OR activat* OR “access line” OR “access recovery charge” OR “all in price” OR “all-in-price” OR “@ease” OR “@ ease” OR “BB cost recovery” OR BBCR OR BBCF OR BCRF OR BRF)</p>	<p>Mary Brewer Gena Carson Dana Chase Lorna Christian Nicholas DeNardo Kathleen Hardy Kathy Flynn Tracy Fuson Marilyn Judish Karen Kroeger Jay Krachinsky Karen Kroeger Stephanie Lake Vicky Lambert Dennis Long Ellie Long Chris Martin Michelle Martin Rich Martinez Maxine Moreau Linda Olsen Stephanie Polk Lev Rejanovinsky Tarry Shuell Annette Sligar Brian Stading James Stevenson II Scott Trezise Kathy Victory Julie Von Ruden Janet Washam Channing Williams</p>	
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28(c)	All Documents concerning the accuracy of CenturyLink employees’ or representatives’ quotation or communication of information regarding pricing and contract terms to Consumer Segment or SMB Segment customers or potential customers (including with respect to any “Closers” or other discounts and “Price for Life,” price lock, or other fixed-rate pricing) as well as any analysis, data, or reports concerning the same (including from the ORKO system, PCE scripts, or any other process, procedure, system, software or other application used in connection with tracking or applying discounts to customer accounts).	<p>Defendants:</p> <p>((polic* OR manual* OR guide* OR procedure* OR bulletin) w/5 (offer* OR disclos* or “fine print” OR “T&CSs”)) OR ((fee* or charg*) w/5 (justif* or reason* or rationale*)) OR ((train* or discipl* or punis* or reassign*) w/5 (disclos* or inaccur*)) OR ((“closer” or “fixed rate” or “price for life”) w/5 (accura* or error*)) AND (consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”)</p> <p>Plaintiffs:</p> <p>(disclos* or undisclos* OR inaccur* OR misquote* OR miscommunicat*) w/50 (offer* or “fine print” OR “T&C*” OR term* OR pric* OR accessor* OR activat* OR “access line” OR “access recovery charge” OR “all in price” OR “all-in-price” OR “@ease” OR “@ ease” OR “BB cost recovery” OR BBCR OR BBCF OR BCRF OR BRF)</p> <p>-----</p> <p>(disclos* or undisclos* OR inaccur* OR misquote* OR miscommunicat*) w/50 (BRR OR “broadband cost recovery” OR “broad band cost recovery” OR “Caller ID” OR “closer offer fallout” OR “Core Connect” OR DirecTV OR equip* OR “extended area service charge” OR “federal access charge” OR fee* OR “fixed rate”)</p> <p>-----</p> <p>(disclos* or undisclos* OR inaccur* OR misquote* OR miscommunicat*) w/50 (hookup* OR HSI OR “high speed internet” OR ICR OR ICRF OR “Inside Wire Maintenance” OR “install” OR “internet cost recovery” OR “internet protection” OR lineguard OR “line guard” OR “non-telecom service surcharge” OR “non telecom service surcharge”)</p> <p>-----</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Scott Besselievre Mary Brewer Gena Carson Dana Chase Lorna Christian Nicholas DeNardo Tracy Fuson Kathleen Hardy</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		<p>(disclos* or undisclos* OR inaccur* OR misquote* OR miscommunicat*) w/50 (Norton OR ((“one time” OR “one-time”) w/5 (“credit” OR “charge” OR “fee”)) OR “optional service*” OR Prism OR (price w/5 (life OR lock OR protect*)) OR Prysm OR roadside OR service* OR “self-install” OR subscri*)</p> <p>-----</p> <p>(disclos* or undisclos* OR inaccur* OR misquote* OR miscommunicat*) w/50 (tax* OR terminat* OR “universal access” OR “universal service” OR upgrad* OR USOC OR “web protection” OR webpack* OR “web pack” OR “wire maintenance” OR wireline)</p> <p>-----</p> <p>(ORKO OR PCE OR ROMS OR IREP) w/50 (disclos* or undisclos* OR inaccur* OR misquote* OR miscommunicat*)</p>	Melissa Harris Nicole Hendrix Karen Kroeger Jay Krachinsky Karen Kroeger Stephanie Lake Vicky Lambert Dennis Long Chris Martin Jennifer Martin Maxine Moreau Linda Olsen Christopher Parker Stephanie Polk Lev Rejanovinsky Tarry Shuell Brian Stading James Stevenson II Kathy Victory Julie Von Ruden Janet Washam Channing Williams	
30	All Documents concerning any Cramming and Billing Issues or any Sales and Billing Complaints concerning any Circle of Excellence honoree, including all Documents concerning any investigation or Discipline of any Circle of Excellence honoree.	<p>Defendants:</p> <p>(“circle of excellence” OR “COE”) W/10 (investigat* OR disciplin* or sanction* OR reprimand* OR misquot* OR fraud* OR overbil* OR unauthoriz* OR misrepresent* OR misquot* OR mislead* OR misled OR decept* OR deceiv* OR undisclos*)</p> <p>Plaintiffs:</p> <p>(“circle of excellence” OR “COE” OR “top seller” OR “top 1%”) AND (investigat* OR disciplin* OR sanction* OR reprimand* OR terminat* OR “corrective action” OR accus* OR cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot*)</p> <p>-----</p> <p>(“circle of excellence” OR “COE” OR “top seller” OR “top 1%”) AND (misrep* OR overbill* OR “over bill*” OR overcharg* OR “over charg*” OR “over-charg*” OR overpa* OR “over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwant* OR violat*)</p> <p>-----</p> <p>(“circle of excellence” OR “COE” OR “top seller” OR “top 1%”) AND ((disclos* OR inform* OR represent* OR reveal* OR sale OR sell* OR shar* OR tell*) w/10 (didn* OR fail* OR weren* OR incomplete* OR “not complet*”))</p> <p>-----</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Annette Sligar</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Annette Sligar Faith Barela Nicolas DeNardo Kathy Flynn Marilyn Judish Ellie Long</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		<p>("circle of excellence" OR "COE" OR "top seller" OR "top 1%") AND ((accura* OR disclos* OR error* OR inform* OR mistak* OR qualif* OR represent* OR reveal* OR sale OR sell* OR shar* OR tell*) w/10 (account* OR fee* OR discount* OR rebate* OR closer* OR term* OR "T&C" OR "T & C" OR pric* OR servic*))</p> <p>-----</p> <p>("circle of excellence" OR "COE" OR "top seller" OR "top 1%") AND ((agree OR approv* OR "ask*" OR autoriz* OR confirm* OR consent OR choice OR choos* OR chose OR want*) w/10 (didn* OR fail* OR weren* OR without))</p>	Michelle Martin Rich Martine Scott Tresize	
31	<p>OMITTED BY DEFENDANTS</p> <p>Without limitation as to time, all Documents concerning CenturyLink's Code of Conduct, including:</p> <p>(a) All Documents concerning the adoption or re-adoption of the Code of Conduct;</p> <p>(b) All Documents concerning the statements in the Code of Conduct referenced in the Complaint, including at ¶153;</p> <p>(c) All Documents concerning Your statements in CenturyLink's SEC filings concerning the Code of Conduct, including those referenced at ¶154 and ¶151;</p> <p>(d) All Documents concerning the enforcement of the Code of Conduct that relate to Sales and Billing Practices;</p> <p>(e) Documents sufficient to identify all CenturyLink personnel who were tasked with or responsible for enforcement of the Code of Conduct; and</p> <p>(f) Documents sufficient to identify all CenturyLink personnel who were cited, investigated or Disciplined for violations of the Code of Conduct that relate to Sales and Billing Practices, including the provisions referenced in ¶153.</p>	<p>Plaintiffs:</p> <p>("code of conduct" OR "truthful and demonstrate integrity" OR "achieve business results at the expense of ethical conduct" OR "truthfully market, promote, advertise and sell our products" OR "commitment to act honestly in all business affairs") w/50 (adopt* OR readopt* OR investig* OR review* OR report* OR analy*)</p> <p>-----</p> <p>("descriptions of our products, services, and prices must be truthful and accurate" OR "misstate facts or mislead customers through Company advertisements or promotions" OR "engage in unethical or deceptive sales practices") w/50 (adopt* OR readopt* OR investig* OR review* OR report* OR analy*)</p> <p>-----</p> <p>("code of conduct") w/50 (investigat* OR disciplin* OR sanction* OR reprimand* OR terminat* OR "corrective action" OR accus* OR cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot*)</p> <p>-----</p> <p>("code of conduct") w/50 (mis-quot* OR misrep* OR overbill* OR "over bill*" OR overcharg* OR "over charg*" OR "over-charg*" OR overpa* OR "over pay" OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR violat*)</p> <p>-----</p> <p>("code of conduct") w/ 50 (offer* or "fine print" OR "T&C*" OR term* OR pric* OR accessor* OR activat* OR "access line" OR "access recovery charge" OR "all in price" OR "all-in-price" OR "@ease" OR "@ ease" OR "BB cost recovery" OR BBCR OR BBCF OR BCRF OR BRF)</p> <p>-----</p> <p>("code of conduct") w/ 50 (BRR OR "broadband cost recovery" OR "broad band cost recovery" OR "Caller ID" OR "closer offer fallout" OR "Core Connect" OR DirecTV OR equip* OR "extended area service charge" OR "federal access charge" OR fee* OR "fixed rate")</p> <p>-----</p> <p>("code of conduct") w/ 50 (hookup* OR HSI OR "high speed internet" OR ICR OR ICRF OR "Inside Wire Maintenance" OR "install" OR "internet cost recovery" OR "internet protection" OR lineguard OR "line guard" OR "non-telecom service surcharge" OR "non telecom service surcharge")</p> <p>-----</p>		<p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		<p>("code of conduct") w/ 50 (Norton OR "optional service*" OR Prism OR "price for life" OR "price lock" OR "price protect*" OR Prysm OR roadside OR service* OR "self-install" OR subscri* OR tax* OR "universal access" OR "universal service")</p> <p>-----</p> <p>("code of conduct") w/ 50 (upgrad* OR USOC OR "web protection" OR webpack* OR "web pack" OR "wire maintenance" OR wireline)</p>		
32	All Documents concerning the Executive Defendants' participation in preparing, making or reviewing any of the alleged false and misleading statements referenced at 190-263.	<p>Defendants:</p> <p>("10Q" OR "10-Q" OR "10K" OR "10-K" OR "annual report" OR "press statement" OR media OR "investor conference" OR "investor call") w/10 ((customer w/3 (first or focus or care or needs or experience or demand)) OR bundl* or ARPU or "additional fees" or "revenue stability" or "discount initiative" OR "price increase" OR "select increase")</p> <p>Plaintiffs:</p> <p>("10Q" OR "10-Q" OR "10K" OR "10-K" OR 8K OR "8-K" OR "annual report" OR "press statement" OR media OR conference OR "investor call" OR analyst) AND ((customer w/3 (first OR focus OR care OR needs OR experience OR demand)) OR bundl* OR ARPU OR "revenue per unit" OR "additional fees" OR "revenue stability" OR "discount initiative" OR "price increase" OR "select increase" OR cram*)</p> <p>-----</p> <p>("10Q" OR "10-Q" OR "10K" OR "10-K" OR 8K OR "8-K" OR "annual report" OR "press statement" OR media OR conference OR "investor call" OR analyst) AND (slam* OR false OR undisclos* OR customer experience in all that we do" OR "creating value for that customer" OR "meet the needs of our customers" OR "customer-oriented sales, marketing and service" OR "meeting customer care needs")</p> <p>-----</p> <p>("10Q" OR "10-Q" OR "10K" OR "10-K" OR 8K OR "8-K" OR "annual report" OR "press statement" OR media OR conference OR "investor call" OR analyst) AND ("strategy to reduce access line loss" OR "solutions tailored to the needs" OR "revenue stability" OR "our customers value the convenience" OR "maintain customer relationships" OR "enhance customer loyalty" OR "continue to positively impact")</p> <p>-----</p> <p>("10Q" OR "10-Q" OR "10K" OR "10-K" OR 8K OR "8-K" OR "annual report" OR "press statement" OR media OR conference OR "investor call" OR analyst) AND ("promote long-term relationships" OR "attract and retain customers" OR "we compete in a maturing market" OR "pretty good methodology" OR "many of customers' list of needs" OR "solid year-over-year growth" OR "real stable revenue" OR "attracting more high-value customers")</p> <p>-----</p> <p>("10Q" OR "10-Q" OR "10K" OR "10-K" OR 8K OR "8-K" OR "annual report" OR "press statement" OR media OR conference OR "investor call" OR analyst) AND ("tightening our credit policies" OR "consistent and sustainable revenues" OR "dependable, paying customers" OR "mitigate some of the churn" OR "little impact on revenue" OR "improve our broadband growth" OR "keep the customers we have" OR "less proclivity to churn")</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		<p>-----</p> <p>("10Q" OR "10-Q" OR "10K" OR "10-K" OR 8K OR "8-K" OR "annual report" OR "press statement" OR media OR conference OR "investor call" OR analyst) AND ("competition adding a lot of fees" OR "higher ARPU, lower churn" OR "less loyal than our traditional bundled customers" OR "double that of what we're seeing" OR "very, very significant churn rate" OR "improve customer retention" OR "middle of that pivot")</p> <p>-----</p> <p>("10Q" OR "10-Q" OR "10K" OR "10-K" OR 8K OR "8-K" OR "annual report" OR "press statement" OR media OR conference OR "investor call" OR analyst) AND ("a lot of them weren't paying" OR "focus on high-value customers" OR "prevent that churn event" OR "added higher ARPU customer" OR "focus on improving our customer experience")</p> <p>-----</p> <p>("10Q" OR "10-Q" OR "10K" OR "10-K" OR 8K OR "8-K" OR "annual report" OR "press statement" OR media OR conference OR "investor call" OR analyst) AND ("better quality customers" OR "adopted written codes of conduct" OR "misstate facts" OR "without that customer's authorization")</p> <p>-----</p> <p>("10Q" OR "10-Q" OR "10K" OR "10-K" OR 8K OR "8-K" OR "annual report" OR "press statement" OR media OR conference OR "investor call" OR analyst) AND ("customer service and billing challenges" OR "meet and exceed our customers' expectations" OR "we take any complaint seriously" OR "process changes can improve the customer experience" OR "provide the best possible experience" OR "provide each customer with a fair and quick resolution")</p> <p>-----</p> <p>("10Q" OR "10-Q" OR "10K" OR "10-K" OR 8K OR "8-K" OR "annual report" OR "press statement" OR media OR conference OR "investor call" OR analyst) AND ("expressly denies these allegations" OR "terms were fully disclosed" OR "violate any applicable standard" OR "exposed to restrictions on our operations" OR "obtain and maintain certificates of authority or licenses" OR "not intended to suggest" OR "substantial costs and limitations")</p>		
33	To the extent not called for by the previous Requests, all Documents concerning any attempt, plan, policy, procedure, or strategy to reduce or eliminate Cramming and Billing Issues, whether implemented or not, including all Documents concerning the actual or anticipated financial or business impact of any such attempt, plan, policy, procedure, or strategy.	<p>Defendants:</p> <p>(enforc* or requir* or impos*) w/10 (sale* w/5 (quota* or target*))</p> <p>Plaintiffs:</p> <p>((enforc* OR requir* OR impos* OR reduc* OR plan OR polic* OR proced* OR strategy*) AND (callback OR "call back" OR cram* OR decei* OR decep* OR defraud* OR fraud)) AND ((impact* OR flatten* OR decreas* OR plateau*) w/10 (revenue OR sales OR business OR finance* OR stock OR share))</p> <p>-----</p> <p>((enforc* OR requir* OR impos* OR reduc* OR plan OR polic* OR proced* OR strategy*) AND (((accura* OR disclos* OR error* OR inform* OR mistak* OR qualif* OR represent* OR reveal* OR sale OR sell* OR shar* OR tell*) w/10 (account* OR fee OR terms OR "T&C" OR "T & C"</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		<p>OR pric* OR servic*)) AND ((impact* OR flatten* OR decreas* OR plateau*) w/10 (revenue OR sales OR business OR finance* OR stock OR share))</p> <p>-----</p> <p>((enforc* OR requir* OR impos* OR reduc* OR plan OR polic* OR proced* OR strategy*) AND (integrity OR lie* OR lying OR misconduct* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep*)) AND ((impact* OR flatten* OR decreas* OR plateau*) w/10 (revenue OR sales OR business OR finance* OR stock OR share))</p> <p>-----</p> <p>((enforc* OR requir* OR impos* OR reduc* OR plan OR polic* OR proced* OR strategy*) AND (“order fallout” OR overbill* OR “over bill*” OR overcharg*) AND ((impact* OR flatten* OR decreas* OR plateau*) w/10 (revenue OR sales OR business OR finance* OR stock OR share))</p> <p>-----</p> <p>((enforc* OR requir* OR impos* OR reduc* OR plan OR polic* OR proced* OR strategy*) AND (“over charg*” OR “over-charge*” OR overpa* OR “over pay” OR over-pay OR ((quot* OR offer*) w/5 “not available”)) AND ((impact* OR flatten* OR decreas* OR plateau*) w/10 (revenue OR sales OR business OR finance* OR stock OR share))</p> <p>-----</p> <p>((enforc* OR requir* OR impos* OR reduc* OR plan OR polic* OR proced* OR strategy*) AND (slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR violat*)) AND ((impact* OR flatten* OR decreas* OR plateau*) w/10 (revenue OR sales OR business OR finance* OR stock OR share))</p> <p>-----</p> <p>((enforc* OR requir* OR impos* OR reduc* OR plan OR polic* OR proced* OR strategy*) AND (quota* OR target OR threshold)) AND ((impact* OR flatten* OR decreas* OR plateau*) w/10 (revenue OR sales OR business OR finance* OR stock OR share))</p>	<p>Stewart Ewing Glen Post Karen Puckett</p> <p>Faith Barela Scott Bessalievre Mary Brewer Felisa Bullock Nicholas DeNardo Kathy Flynn Wesley Gibson Stacey Goff Kevin Grewe John Helbling Dan Hubert Jantzen Hughes Vernon Irvin Marilyn Judish Kristin Konecny Jay Krachinsky Karen Kroeger Stephanie Lake Dennis Long Ellie Long Chris Martin Michelle Martin Rich Martinez Susan McKown Maxine Moreau Linda Olsen James Stevenson II Stephanie Polk Lev Rejanovinsky Tarry Shuell Annette Sligar Scott Welch Scott Trezise Kathy Victory Julie Von Ruden Channing Williams Chris Young</p>	
34(a)	All Documents concerning CenturyLink’s sales and revenue projections and Sales Targets, including: (a) Documents sufficient to show Your processes and procedures for projecting sales and revenues and setting and evaluating Sales	<p>Defendants:</p> <p>((project* OR estimat* OR target* or goal*) W/3 (sale* OR revenue*)) AND (consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p>

	Targets, including for the Consumer Segment and the SMB Segment;	<p>Plaintiffs:</p> <p>(project* OR estimat* OR target* OR goal* OR forecast*) AND (quota* OR threshold* OR target* OR goal OR “development* plan” OR ((gap OR rev*) w/5 (clos* OR fill*)) OR “new promoter scor*” OR NPS OR (“number is the number”))</p> <p>-----</p> <p>(project* OR estimat* OR target* OR goal* OR forecast*) AND (retention w/5 rate) OR (revenue w/5 protect*) OR “save by selling” OR “competition” OR “Revenue Assurance” OR “variance analys* OR churn OR attrit* OR “feasibility report* OR ARPU OR “average revenue” OR churn* OR ((revenue OR sales) w/5 (flatten* OR plateau* OR declin*))</p>	<p>Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Scott Besselievre Dana Chase Geoff Gairrett Wesley Gibson Jantzen Hughes Jay Krachinsky Chris Martin Lee Massey Maxine Moreau Linda Olsen Lev Rejanovinsky Brian Stading Julie Von Ruden Scott Welch Chris Young</p>	9/1/12 - 4/1/18
34(b)	All Documents concerning sales and revenue projections and Sales Targets for the Consumer Segment or SMB Segment that were sent to, sent by, copied to, or forwarded to any Executive Defendant;	<p>Defendants:</p> <p>((project* OR estimat* OR target* or goal*) W/3 (sale* OR revenue*)) AND (consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”)</p> <p>Plaintiffs:</p> <p>See Request 34(a)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>See Request 34(a)</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>See Request 34(a)</p>
34(c)	All Documents constituting reports or data concerning sales and revenue projections and Sales Targets for the Consumer Segment or SMB Segment that were accessible by or made available to any Executive Defendant;	<p>Defendants:</p> <p>((project* OR estimat* OR target* or goal*) W/3 (sale* OR revenue*)) AND (consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”)</p> <p>Plaintiffs:</p> <p>See Request 34(a)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>See Request 34(a)</p>

			<div>Karen Puckett</div> <div>Plaintiffs:</div> <div>See Request 34(a)</div>	
34(d)	All Documents referenced, reviewed or used by Linda Olsen during monthly calls to discuss employee sales performance and Discipline, including any spreadsheets concerning employee sales performance (including gross revenue, revenue per order, revenue per call, calls per hour, and revenue per hour) and any Discipline taken as a result of sales performance, including as described at 75;	<div>Defendants:</div> <div>(monthly OR “month-end”) AND ((employee* w/5 perfor* or sales*) OR “revenue per order” or “revenue per call” or “calls per hour” or “revenue per hour”) AND (consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”) AND (olsen or linda)</div> <div>Plaintiffs:</div> <div>(monthly OR “month-end” OR “end of month” OR call* OR meet* OR conference OR spreadsheet* OR report* OR “roundtable” OR “round table” OR “focus group” OR huddle* OR roundup OR “round up”) w/50 (“revenue per order” OR “revenue per call” OR “calls per hour” OR “revenue per hour” OR “key perform*” OR KPI OR PIP OR “promise tracking tool” OR “customer service record” OR “new promoter scor*” OR NPS OR “save by selling”)</div> <div>-----</div> <div>(monthly OR “month-end” OR “end of month” OR call* OR meet* OR conference OR spreadsheet* OR report* OR “roundtable” OR “round table” OR “focus group” OR huddle* OR roundup OR “round up”) w/50 (perform* w/5 (improv* OR evaluat* OR manag* OR measure*))</div> <div>-----</div> <div>(monthly OR “month-end” OR “end of month” OR call* OR meet* OR conference OR spreadsheet* OR report* OR “roundtable” OR “round table” OR “focus group” OR huddle* OR roundup OR “round up”) AND (“circle of excellence” OR COE OR (retention w/5 rate) OR ((revenue* OR retention) w/5 (project* OR protect* OR rate)) OR (gap w/5 (clos* OR fill*)) OR goal OR ((mak* OR miss*) w/10 number))</div> <div>-----</div> <div>(monthly OR “month-end” OR “end of month” OR call* OR meet* OR conference OR spreadsheet* OR report* OR “roundtable” OR “round table” OR “focus group” OR huddle* OR roundup OR “round up”) w/50 (churn OR “service order quality report” OR SOQ OR scorecard*)</div> <div>-----</div> <div>(monthly OR “month-end” OR “end of month” OR call* OR conference OR spreadsheet* OR “roundtable” OR “round table” OR “focus group” OR huddle* OR roundup OR “round up”) w/50 (attrit* OR “Calibration Session*” OR coach* OR CDB * OR “development* plan” OR “behav* coach*” OR “corrective action” OR defraud* OR enforce* OR escalat* OR ethic* OR exit* OR fire OR fired OR firing OR leav*)</div> <div>-----</div> <div>(monthly OR “month-end” OR “end of month” OR call* OR meet* OR conference OR spreadsheet* OR report* OR “roundtable” OR “round table” OR “focus group” OR huddle* OR roundup OR “round up”) w/50 (miscond* OR “order accuracy” OR punis* OR quit* OR reprimand* OR resign* OR “revolving door” OR “step* down” OR grievance OR terminat* OR turnover OR warn* OR “write up” OR “written up” OR strike*)</div>	<div>Defendants:</div> <div>Linda Olsen Gloria Spencer</div> <div>Plaintiffs:</div> <div>Linda Olsen Gloria Spencer Faith Barela Scott Besselievre Nicholas DeNardo Kathy Flynn Kim Frantz Geoff Gairrett Marilyn Judish Jay Krachinsky Ellie Long Chris Martin Michelle Martin Rich Martinez Lee Massey Lev Rejanovinsky Annette Sligar Scott Trezise Julie Von Ruden Scott Welch</div>	<div>Defendants:</div> <div>3/1/13 - 7/12/17</div> <div>Plaintiffs:</div> <div>9/1/12 - 4/1/18</div>
34(e)	All Documents concerning the setting and evaluation of sales and revenue projections	<div>Defendants:</div>	<div>Defendants:</div>	<div>Defendants:</div>

	and Sales Targets and any proposed changes (whether or not implemented) to the setting and evaluation of sales and revenue projections or Sales Targets, including as described at 68-70.	<p>((project* OR estimat* OR target* or goal*) W/3 (sale* OR revenue*)) AND (consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”)</p> <p>Plaintiffs:</p> <p>See Request 34(a)</p>	<p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p> <p>See Request 34(a)</p>	<p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>See Request 34(a)</p>
35	All Documents concerning Consumer Segment and SMB Segment sales performance that were sent to, sent by, copied to, forwarded to, or referenced any Executive Defendant, Kathy Victory, Kathy Flynn, Linda Olsen, or Brian Stading, and Documents sufficient to identify all reports or data concerning Consumer Segment or SMB Segment sales performance that were accessible by or made available to any Executive Defendant, Kathy Victory, Kathy Flynn, Linda Olsen, or Brian Stading.	<p>Defendants:</p> <p>(consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”) w/10 (“sales performance” or (sale* w/5 updat*) or “revenue performance” or (revenue* w/5 updat*) or “sales data” or “revenue data” or “sales report” or “revenue report”)</p> <p>Plaintiffs:</p> <p>(consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”) w/50 (attrit* OR ARPU OR “average revenue per” OR churn* OR “feasibility report” OR forecast* OR projection OR headwind*)</p> <p>-----</p> <p>(consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”) AND (gap w/5 (clos* OR fill*)) OR “per share” OR “revenue assurance” OR ((revenue OR sale*) w/10 (decreas* OR increase* OR flatten* OR plateau* OR declin*))</p> <p>-----</p> <p>(consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”) AND ((sale* OR revenue) w/5 (analy* OR perform* OR update* OR data OR track* OR report* OR review* OR assess*)) OR “save by selling” OR “variance analys*</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn Linda Olsen Brian Stading Kathy Victory</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn Linda Olsen Brian Stading Kathy Victory</p>	<p>3/1/13 - 7/12/17</p> <p>Defendants:</p> <p>9/1/12 - 4/1/18</p>
36(a)	All Documents concerning Your analysis or tracking of revenue or other financial metrics on a per-customer basis, including: (a) Documents sufficient to show how you determined Average Revenue Per User for the Consumer and SMB Segments, including what comprised that figure;	<p>Defendants:</p> <p>(“average revenue per user” OR “ARPU”) AND (analy* or track*) AND (consumer* OR residential OR “small business” OR “small and medium business” OR “SMB”)</p> <p>Plaintiffs:</p> <p>(“average revenue per user” OR “ARPU”)</p> <p>W/50</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Plaintiffs:</p>	<p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>

		(analy* OR track* OR assess* OR report* OR review* OR monitor* OR determin* OR compris* OR calculat*)	Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Wesley Gibson Jantzen Hughes Maxine Moreau Janet Washam Chris Young	
36(b)	All Documents concerning Douglas’s statement referenced in 140 that: “[W]e see competition adding a lot of fees. And so, that’s where there might be a little bit of a delta, but we’re working through, and constantly monitoring what our competitors are doing in the marketplace, with regard to the average ARPUs in our business.”	Defendants: (competitor* OR competition) W/5 ((add* w/5 fee*) OR “average revenue per user” OR “ARPU”) OR “where there might be a little bit of delta” Plaintiffs: (competitor* OR competition OR AT&T OR COMCAST OR “Time Warner” OR Altice OR Verizon OR Charter OR “Cable One” OR Cox OR “Consolidated Communications” OR Frontier OR TDS OR Mediacom OR Windstream OR Stealth) w/50 ((add* w/5 fee*) OR attrit* OR ARPU OR “average revenue per” OR delta)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett	Defendants: 3/1/13 - 7/12/17 Plaintiffs: 9/1/12 - 4/1/18
37	All Documents concerning the business strategies referenced at 205-36, including all Documents concerning CenturyLink’s “bundling” strategy, its pricing and discounting strategies, the “pivot” away from standalone broadband towards “bundling,” and any “credit tightening” changes or initiatives.	Defendants: (bundl* or (credit* w/2 tighten*)) AND pivot* Plaintiffs: (bundl* OR (credit* w/15 tighten*)) AND (pivot* OR iniat* OR change* OR (new w/5 (strateg* OR plan OR initiative)))	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn Linda Olsen Scott Trezise Kathy Victory Plaintiffs: Clay Bailey	Defendants: 1/1/15 - 12/31/15 Plaintiffs: 9/1/12 - 4/1/18

			David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn Linda Olsen Scott Trezise Kathy Victory Tony Davis Stacey Goff Mark Molzen Kevin Olin Kristina Waugh	
38(a)	OMITTED BY DEFENDANTS All Documents concerning the hiring, employment, promotion, demotion, assignment, reassignment, resignation, termination or Discipline of each Executive Defendant, Kathy Victory, Kathy Flynn, Linda Olsen, Brian Stading, and Eric Adams, including: (a) Each individual's personnel file;	Plaintiffs: Plaintiffs: (hir* OR promot* OR reassign* OR (chang* w/5 (role OR position)) OR demot* OR depart* OR leav* OR left OR termina* OR fire* OR resign* OR quit* OR "step down") AND (victory OR Flynn OR Olsen OR stading OR adams)	Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Victory Eric Adams Faith Barela Nicholas DeNardo Kathy Flynn Bruce Hanks Marilyn Judish Ellie Long Michelle Martin Rich Martinez Linda Olsen Annette Sligar Brian Stading Scott Trezise	Plaintiffs: 9/1/12 - 4/1/18
38(b)	All Documents concerning (i) Defendant Douglas's hiring as President, Sales and Marketing in 2016, (ii) his change in role to President, Enterprise Markets, (iii) the decision to appoint him as a member of the "senior leadership team," and (iv) his departure from CenturyLink;	Defendants: "Dean Douglas" w/5 (hir* or promot* or reassign* or (chang* w/5 (role or position)) or "senior leadership team" or depart*) Plaintiffs: (Dean w/3 Douglas OR (president w/3 "sales and marketing"))	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post	Defendants: 1/1/16 - 7/31/17 Plaintiffs: 1/1/16 - 9/1/17

		<p>AND</p> <p>(hir* OR promot* OR reassign* OR (chang* w/5 (role OR position)) OR “senior leadership team” OR promot* OR depart* OR leav* OR left OR “step down” OR termina* OR fire* OR resign* OR quit*)</p>	<p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post</p> <p>Tony Davis Stacey Goff Bruce Hanks Mark Molzen Kevin Olin Kristina Waugh</p>	
38(c)	All Documents concerning (i) Puckett’s change in role to President, Global Markets in or around November 2014, and (ii) her departure from the Company announced in June 2015; and	<p>Defendants:</p> <p>“Karen Puckett” w/5 (((chang* or “new”) w/10 (role or position or title)) or depart* or terminat* or resign*)</p> <p>Plaintiffs:</p> <p>(Karen w/3 Puckett OR (president w/3 “global markets”))</p> <p>AND</p> <p>(((chang* OR “new”) w/10 (role OR position OR title)) OR promot* OR depart* OR terminat* OR resign* OR fire* OR quit* OR leav* OR left OR “step* down”)</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett</p> <p>Tony Davis Stacey Goff Bruce Hanks Mark Molzen Kevin Olin Kristina Waugh</p>	<p>Defendants:</p> <p>10/15/14 - 6/30/15</p> <p>Plaintiffs:</p> <p>10/1/14 - 8/30/15</p>
38(d)	All Documents concerning (i) the decision that Post would be succeeded as CEO of CenturyLink following the Level 3 merger on January 1, 2019, and (ii) all Documents concerning the change in date of Post’s resignation or retirement from January 1, 2019 to May 23, 2018.	<p>Defendants:</p> <p>(“Glen Post” w/20 (succeed* or resign* or retir*)) AND (“Level 3” or merg* or (chang* w/2 date))</p> <p>Plaintiffs:</p> <p>(Glen OR Post OR CEO OR president)</p> <p>AND</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post</p> <p>Plaintiffs:</p>	<p>Defendants:</p> <p>10/31/16 - 3/6/18</p> <p>Plaintiffs:</p> <p>10/31/16 - 6/1/18</p>

		(succeed* OR success* OR resign* OR retir* OR “step down” OR left OR leav* OR depart* OR fire OR fired OR “January 1, 2019” OR “May 23, 2018” OR ((following OR clos* OR after) w/5 (L3 OR Level3 OR “Level 3”)) OR (chang* w/2 date))	Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Tony Davis Stacey Goff Bruce Hanks Mark Molzen Kevin Olin Kristina Waugh	
39	All Documents concerning Joseph Zimmer’s tenure on and departure from Your board of directors, including all Documents concerning Zimmer’s statements that (i) Your conduct raised “serious governance, transparency and honesty issues” and (ii) a press release You prepared was “incomplete and inaccurate” and “deliberately misleading in a material way.”	Defendants: (Zimmer W/10 (depart* OR resign* OR fir* OR termin*)) OR “serious governance, transparency and honesty issues” OR “deliberately misleading in a material way” Plaintiffs: Zimmer AND (depart* OR resign* OR fir* OR termin*OR quit* OR leav* OR left OR “step down”) ----- Zimmer AND (governance OR transparency OR honest* OR dishonest* OR disingenuous OR fraud OR mislead* OR incomplete* inaccurate* OR misrepresent* OR mislea* OR material OR “Monroe directors” OR crim* OR illegal)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Tony Davis Stacey Goff Bruce Hanks Mark Molzen Kevin Olin Kristina Waugh	Defendants: 3/1/13 - 7/12/17 Plaintiffs: 9/1/12 - 4/1/18
40(a)	All Documents concerning all alleged corrective disclosures set forth at 264-67, including: (a) All Documents concerning the declines in the prices of CenturyLink securities discussed at 264-67;	Defendants: (share price OR “stock price” OR “\$CTL”) and (drop* or declin*) Plaintiffs: (share* OR stock* OR “*CTL”)	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett	Defendants: 6/1/17 - 7/31/17 Plaintiffs: 6/1/17 - 10/1/17

		AND (drop* OR declin* OR fall* OR loss OR fluctuat* OR mov* OR plateau OR valu*)	Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Tony Davis Stacey Goff Mark Molzen Maxine Moreau Kevin Olin Kristina Waugh	
40(b)	(b) All Documents concerning any Communications with analysts, investors, the media, or any Governmental Entity concerning CenturyLink’s Sales and Billing Practices, including with respect to the Bloomberg article titled “CenturyLink Is Accused of Running a Wells-Fargo Like Scheme” dated June 16, 2017, the Bloomberg article titled “CenturyLink Faces Class-Action Lawsuit Seeking Up to \$12 Billion” dated June 19, 2017, and the Bloomberg article titled “CenturyLink Sued by Minnesota Amid \$12 Billion Class Action” dated July 12, 2017, and all related Communications, articles, discussions or references concerning the events, circumstances and facts referenced in those Bloomberg articles, including all Communications to, from, copied to, or forwarded to any Executive Defendant or any of CenturyLink’s executives, officers, directors, or investor relations personnel.	Defendants: (analyst* or “investor* relations” or “IR” or media or “AG” or “Attorney General” or agency or BBB or “Better Business Bureau” or “FCC” or Minnesota) AND (Bloomberg or “class action” or “class-action” or lawsuit or sue* or suit or “Accused of Running”) Plaintiffs: (analyst* OR media OR Jeffries OR Oppenheimer OR Barclays OR BMO or “Bank of America” OR Citigroup OR Cowen OR Deutsche Bank OR DB OR Gabelli OR Goldman OR “JP Morgan” OR JPMorgan OR Macquarie OR “Morgan Stanley”) AND (integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR “missing discount” OR “order fallout”) ----- (analyst* OR media OR Jeffries OR Oppenheimer OR Barclays OR BMO or “Bank of America” OR Citigroup OR Cowen OR Deutsche Bank OR DB OR Gabelli OR Goldman OR “JP Morgan” OR JPMorgan OR Macquarie OR “Morgan Stanley”) AND (overbill* OR “over bill*” OR overcharg* OR “over charg*” OR “over-charg*” OR overpa*) ----- (analyst* OR media OR Jeffries OR Oppenheimer OR Barclays OR BMO or “Bank of America” OR Citigroup OR Cowen OR Deutsche Bank OR DB OR Gabelli OR Goldman OR “JP Morgan” OR JPMorgan OR Macquarie OR “Morgan Stanley”) AND (“over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwant* OR upsell* OR violat*) ----- (analyst* OR media OR Jeffries OR Oppenheimer OR Barclays OR BMO or “Bank of America” OR Citigroup OR Cowen OR Deutsche Bank OR DB OR Gabelli OR Goldman OR “JP Morgan” OR JPMorgan OR Macquarie OR “Morgan Stanley”) AND (“1 out of 5” OR “accused of running” OR Bloomberg OR whistle OR “class action” OR “class-action” OR defraud* OR cram* OR “Wells Fargo”) -----	Defendants: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Plaintiffs: Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Tony Davis Stacey Goff Mark Molzen Maxine Moreau Kevin Olin Kristina Waugh	Defendants: 6/1/17 - 7/31/17 Plaintiffs: 6/1/17 - 4/1/18

		<p>(analyst* OR media OR Jeffries OR Oppenheimer OR Barclays OR BMO or “Bank of America” OR Citigroup OR Cowen OR Deutsche Bank OR DB OR Gabelli OR Goldman OR “JP Morgan” OR JPMorgan OR Macquarie OR “Morgan Stanley”) AND (“fake account” OR “fake-account” OR Heiser OR lawsuit OR “law suit” OR scheme OR slam*)</p> <p>-----</p> <p>(Nomura OR “Raymond James” OR UBS OR BBB OR “Better Business Bureau” OR “AG” OR “Attorney General” OR agency OR “FCC” OR Minnesota OR MN OR Arizona OR AZ) AND (integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR “missing discount” OR “order fallout”)</p> <p>-----</p> <p>(Nomura OR “Raymond James” OR UBS OR BBB OR “Better Business Bureau” OR “AG” OR “Attorney General” OR agency OR “FCC” OR Minnesota OR MN OR Arizona OR AZ) AND (overbill* OR “over bill*” OR overcharg* OR “over charg*” OR “over-charg*” OR overpa*)</p> <p>-----</p> <p>(Nomura OR “Raymond James” OR UBS OR BBB OR “Better Business Bureau” OR “AG” OR “Attorney General” OR agency OR “FCC” OR Minnesota OR MN OR Arizona OR AZ) AND (“over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwant* OR upsell* OR violat*)</p> <p>-----</p> <p>(Nomura OR “Raymond James” OR UBS OR BBB OR “Better Business Bureau” OR “AG” OR “Attorney General” OR agency OR “FCC” OR Minnesota OR MN OR Arizona OR AZ) AND (“1 out of 5” OR “accused of running” OR Bloomberg OR whistle OR “class action” OR “class-action” OR defraud* OR cram* OR “Wells Fargo”)</p> <p>-----</p> <p>(Nomura OR “Raymond James” OR UBS OR BBB OR “Better Business Bureau” OR “AG” OR “Attorney General” OR agency OR “FCC” OR Minnesota OR MN OR Arizona OR AZ OR “Joele Frank” OR JF OR @joelefrank.com) AND (“fake account” OR “fake-account” OR Heiser OR lawsuit OR “law suit” OR scheme OR slam*)</p>		
42	To the extent not called for by the previous Requests, all Documents concerning CenturyLink’s securities or investor relations, including all Documents concerning or evincing communications between or among any Executive Defendant, on the one hand, and any member of CenturyLink’s investor relations team, any CenturyLink investor or potential investor, any other Executive Defendant, or any analyst, on the other hand.	<p>Defendants:</p> <p>3/1/13 - 7/12/17: (integrity OR fraud* OR overbil* OR unauthoriz* OR misrepresent* OR mislead* OR misled OR decept* OR deceiv* OR undisclos* or compliance or violat*) AND “investor relations”</p> <p>6/1/17 - 7/31/17: (share price OR “stock price” OR “\$CTL”) and (drop* or declin*) AND “investor relations”</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18:</p> <p>((investor* w/15 (relations OR personnel OR communications)) OR PR OR “public relations” OR “Joele Frank” OR JF OR @joelefrank.com) AND (comply OR compliance OR cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR overbill* OR “over bill*” OR overcharg* OR “over charg*”)</p> <p>-----</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kristina Waugh</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing</p>	<p>Defendants</p> <p>3/1/13 - 7/12/17</p> <p>6/1/17 - 7/31/17</p> <p>Plaintiffs</p> <p>9/1/12 - 4/1/18</p> <p>6/1/17 - 9/1/17</p>

		<p>((investor* w/15 (relations OR personnel OR communications)) OR PR OR “public relations” OR “Joele Frank” OR JF OR @joelefrank.com) AND (overpa* OR “over pay” OR over-pay OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR upsell* OR violat* OR “1 out of 5” OR “accused of running” OR Bloomberg OR “class action” OR “class-action” OR “consumers who have been”)</p> <p>-----</p> <p>((investor* w/15 (relations OR personnel OR communications)) OR PR OR “public relations” OR “Joele Frank” OR JF OR @joelefrank.com) AND (“fake account” OR “fake-account” OR Heiser OR (“Level 3” OR merge*) w/25 (risk* OR fail* OR fall OR “blow up” OR threat*)) OR “Wells Fargo” OR “WF”)</p> <p>-----</p> <p>((investor* w/15 (relations OR personnel OR communications)) OR PR OR “public relations” OR “Joele Frank” OR JF OR @joelefrank.com) AND (((Minn* OR MN OR Arizona OR AZ) w/5 (AG OR A.G. OR “Attorney* General*”)) OR “news conference to communicate her concerns” OR scheme OR slam* OR Swanson OR “without that customer’s authorization” OR whistle*)</p> <p>-----</p> <p>6/1/17 - 9/1/17:</p> <p>((share* OR stock* OR “*CTL”)</p> <p>AND</p> <p>(drop* OR declin* OR fall* OR loss OR fluctuat* OR mov* or valu*)</p> <p>AND</p> <p>((investor* w/15 (relations OR personnel OR communications)) OR PR OR “public relations” OR analyst OR “Joele Frank” OR JF OR @joelefrank.com)</p>	<p>Glen Post Karen Puckett Kristina Waugh</p> <p>Tony Davis Stacey Goff Mark Molzen Kevin Olin</p>	
43(a)	Without limitation as to time, all Documents concerning any investigation or inquiry by a Governmental Entity concerning cramming, including: (a) All Documents concerning the Senate Committee on Commerce, Science, and Transportation’s investigation concerning third-party cramming referenced at 45;	<p>Defendants</p> <p>(“AT&T” w/10 (FTC or “Federal Trade Commission”))</p> <p>Plaintiffs:</p> <p>(Rockefeller OR Senat* OR (Commerce w/5 Committee)) AND (“cracking down” OR (ghost* w/5 (charg* OR bill*)) OR (“third party” OR third-party) w/10 billing) OR cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie* OR lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep*)</p> <p>-----</p> <p>(Rockefeller OR Senat* OR (Commerce w/5 Committee)) AND (overbill* OR “over bill*” OR overcharg* OR “over charg*” OR “over-charge*” OR overpa* OR “over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR upsell* OR violat*)</p> <p>-----</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Victory Kathy Flynn Linda Olsen Scott Belka</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas</p>	<p>Defendants:</p> <p>10/7/14 - 10/21/14</p> <p>Plaintiffs:</p> <p>1/1/12 - 12/31/14</p>

		<p>(Rockefeller OR Senat* OR (Commerce w/5 Committee)) AND ((disclos* OR inform* OR represent* OR reveal* OR sale OR sell* OR shar* OR tell*) w/10 (didn* OR fail* OR weren* OR incomplete* OR “not complet*”))</p> <p>-----</p> <p>(Rockefeller OR Senat* OR (Commerce w/5 Committee)) AND ((accus* OR agree OR approv* OR ask* OR authoriz* OR confirm* OR consent OR choice OR choos* OR chose OR want*) w/10 (didn* OR fail* OR weren* OR without))</p>	<p>Stewart Ewing Glen Post Karen Puckett Kathy Victory Kathy Flynn Linda Olsen Scott Belka</p> <p>Felisa Bullock Stacey Goff Kevin Grewe John Helbling Dan Hubert Chris Sullivan</p>	
43(e)	All Documents concerning the claims asserted or settlements reached by the FTC and other Governmental Entities referenced at 51.	<p>Defendants</p> <p> (“AT&T” w/10 (FTC or “Federal Trade Commission”))</p> <p>Plaintiffs:</p> <p> (“AT&T” w/10 (FTC or “Federal Trade Commission”))</p> <p>-----</p> <p>((FTC OR “Federal Trade Commission”) AND ((claim* OR settl* OR investigat* OR enforce* OR subpoena* OR request* OR CID OR “civil investigative demand”)) AND (cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie* OR lying OR miscond* OR misled OR mislead*))</p> <p>-----</p> <p>((FTC OR “Federal Trade Commission”) AND ((claim* OR settl* OR investigat* OR enforce* OR subpoena* OR request* OR CID OR “civil investigative demand”)) AND (misquot* OR mis-quot* OR misrep* OR overbill* OR “over bill*” OR overcharg* OR “over charg*” OR “over-charg*”))</p> <p>-----</p> <p>((FTC OR “Federal Trade Commission”) AND ((claim* OR settl* OR investigat* OR enforce* OR subpoena* OR request* OR CID OR “civil investigative demand”)) AND (overpa* OR “over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwant*))</p> <p>-----</p> <p>((FTC OR “Federal Trade Commission”) AND ((claim* OR settl* OR investigat* OR enforce* OR subpoena* OR request* OR CID OR “civil investigative demand”)) AND (upsell* OR violat* OR disclos* OR inform* OR represent* OR reveal* OR sale OR sell* OR shar* OR tell*))</p>	<p>Defendants:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Scott Belka Kathy Flynn Linda Olsen Kathy Victory</p> <p>Plaintiffs:</p> <p>Clay Bailey David Cole Dean Douglas Stewart Ewing Glen Post Karen Puckett Kathy Flynn Scott Belka Linda Olsen Kathy Victory</p> <p>Felisa Bullock Stacey Goff Kevin Grewe John Helbling Dan Hubert</p>	<p>Defendants:</p> <p>10/7/14 - 10/21/14</p> <p>Plaintiffs:</p> <p>8/1/2014 - 4/1/18</p>

44	All Documents concerning any representations or statements You made to any Governmental Entity concerning your compliance with rules, regulations, or other requirements concerning consumer protection or service standards, including the statements referenced in 50.	<p>Defendants:</p> <p>“familiar with the Company’s day-to-day operations” or “complying with applicable service quality standards and consumer protection rules” or “unauthorized switching to another telecommunications provider and unauthorized inclusion, or addition of services, commonly known as slamming and cramming”</p> <p>Plaintiffs:</p> <p>(Comply* OR compliance*) w/50 (“quality standard*” OR “service standard*” OR “unauthorized switching” OR “unauthorized inclusion” OR “consumer protection” OR cram* OR decei* OR decep* OR defraud* OR fraud* OR integrity OR lie)*</p> <p>-----</p> <p>(Comply* OR compliance*) w/50 (lying OR miscond* OR misled OR mislead* OR misquot* OR mis-quot* OR misrep* OR overbill* OR “over bill*” OR overcharg* OR “over charg*” OR “over-charge”)</p> <p>-----</p> <p>(Comply* OR compliance*) w/50 (overpa* OR “over pay” OR over-pay OR slam* OR unapprov* OR unauthoriz* OR undisclos* OR unwanted* OR upsell* OR violat*)</p> <p>-----</p> <p>“familiar with the Company’s day-to-day operations”</p> <p>-----</p> <p>“complying with applicable service quality standards and consumer protection rules”</p> <p>-----</p> <p>“unauthorized switching to another telecommunications provider and unauthorized inclusion, or addition of services, commonly known as slamming and cramming”</p>	<p>Defendants:</p> <p>David Cole</p> <p>Plaintiffs:</p> <p>David Cole</p>	<p>Defendants:</p> <p>3/1/13 - 7/12/17</p> <p>Plaintiffs:</p> <p>9/1/12 - 4/1/18</p>
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